

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 171

PLACER COUNTY
DATE RECEIVED
1707 Grouse Ridge Road
Northstar, CA 96161
August 16, 2002

AUG 19 2002

Attn: Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 "B" Avenue
Auburn, CA 95603
PLANNING DEPARTMENT

Re: Draft Environmental Impact Report ("DEIR) for the Proposed Martis Valley
Community Plan ("MVCP") Update, SCH No.: 2001072050

Dear Ms. Lawrence:

The purpose of this letter is to comment on affordable housing.

At the Citizens Advisory Committee meetings a number of citizens have stated that the plans under consideration by the County for the Martis Valley do not address their concerns on affordable housing. Separately, a project for workforce housing which may have an affordable housing component was introduced by Northstar and ultimately approved by the Board of Supervisors utilizing their authority to grant general plan amendments and their authority to proceed with planning decisions independent of the process of updating the community plan. The point of reviewing this part of the history of the Citizens meeting and actions taken by the Board is to suggest that affordable and workforce housing are critically important issues to both citizens and elected decision makers.

171-1

In reviewing the Table of Contents for the Public Review Draft of the Martis Valley Community Plan dated May 23, 2002 and the associated Draft Environmental Impact Report dated May 2002, I do not see an entry for "affordable housing" or for "workforce housing". Also, these documents do not have a topical index. Please let me and other interested readers know where the affordable housing and workforce housing topics are discussed.

I believe the topics of affordable and workforce housing are sufficiently important that an interested reader should be able to find these topics in the Table of Contents.

Thank you for the opportunity to comment.

Sincerely,


David C. Welch

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 171: DAVID C WELCH, RESIDENT

Response 171-1: The commenter is referred to Master Response 3.4.8 (Affordable and Employee Housing Effects of the Project).

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 172

PLACER COUNTY
DATE
RECEIVED

AUG 12 2002 *fy*

PLANNING DEPARTMENT

1707 Grouse Ridge Road
Northstar, CA 96161

111 Sandringham Road
Piedmont, CA 94611

August 10, 2002

Mr. Fred Yeager, Director
Placer County Planning Department
11414 "B" Avenue
Auburn, CA 95603

Re: Formal Comment Period for the Draft Environmental Impact Report ("DEIR") for the Proposed Martis Valley Community Plan ("MVCP") Update, SCH No.: 2001072050

Dear Fred:

First, thank you for extending the initial formal comment period on this project to August 19, 2002.

172-1

Second, the purpose of this letter is to request that you consider a further extension of the comment period as outlined below. Before making the specific request, I should comment briefly on a couple of points. (I do understand that the County will receive and consider comments submitted after the August 19, 2002 "deadline".) Your decision to establish August 19th as the revised formal comment deadline made sense given the meeting schedule of the Citizens' Advisory Committee and the practical considerations concerning initiation of the Planning Commission's review of the proposed project and its related impacts. Also, I believe that the extension was adequate to give professional comment writers a reasonable opportunity to respond. (Many of the issues raised by the proposed project likely will receive additional comments after August 19.) Even so, I request an extension of the August 19, 2002 deadline until the end of August 2002.

172-2

My reason for requesting this extension is to expand the opportunity for the public to submit comments which will be addressed in writing by County Planning staff. As a member of the public with well above average access to information and assistance in understanding and commenting on issues raised by the proposed project and the related impact analysis, I can assure you this is a daunting prospect for us.

My suggestion is that you announce the extension at an appropriate time during the upcoming Citizens' Advisory Committee meeting. By delaying your announcement until after the expiration of the formal deadline you will not be encouraging anyone to delay the effort of preparing and submitting comments, especially not the professional comment writers, but you will be expanding the opportunity for members of the public to participate in this process.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Thank you in advance for your many efforts to inform us all about planning issues and Placer County Planning's evaluation of the impacts of this project. And thank you for considering this request to extend again the formal comment deadline.

172-2
Cont'd

Sincerely,


David C. Welch

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 172: **DAVID C. WELCH, RESIDENT**

Response 172-1: Comment noted. The commenter is referred to Master Response 3.4.9 (Adequacy of the Public Review Period).

Response 172-2: The commentor is referred to Response to Comment 172-1.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 173

August 17, 2002

Attn: Lori Lawrence
Environmental Review Technician
Placer County Planning Dept.
11414 "B" Ave.
Auburn, Ca. 95603

PLACER COUNTY
DATE
RECEIVED

AUG 19 2002

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update

PLANNING DEPARTMENT

Dear Ms. Lawrence,

I am a part-time resident of Northstar, and have been actively following the planning process for the Martis Valley for two years. Many aspects of the County's preferred plan and the associated Draft Environmental Impact Report concern me. In this letter I wish to address the water flow in Martis Creek. I have walked my dog in the Martis Creek Nature Area (South side of 267) for several years. This is the lowest I have ever seen the creek. Perhaps that is attributable to the 3-year drought we are experiencing. However, that does not explain why long term residents state that they have never seen the creek so low, and that "fingerling" creeks are dry that in previous years have flowed year-round. Although the data is collected on the North side of Martis Creek reservoir, and might not be applicable, I have enclosed some data from the following USGS website:

<http://nevada.usgs.gov/index.shtml>, in the "real-time stream flow section". The mean depth for Martis Creek near Truckee California for Aug. 17 is 7.39. (Refer Attachment 1: "16050102 Truckee") Today's depth is substantially less than that. (Refer Attachment 2: "USGS 10339400 Martis C Nr Truckee Ca"). The past 41 years have included some significant drought years, so the difference in today's stream flow (3.3) from the mean is surprising to me. Can you access data from previous drought years, compare it with the situation today, and perform a detailed analysis to reassure residents that current development in the Martis Valley is not affecting the stream flow of the Martis Valley?

173-1

I am not a hydrologist; therefore, it is difficult for me to understand why the water depth in Martis Creek should increase in August. This was brought to my attention when a fellow dog-walker noted that her dog was swimming in the exact same spot where it had been able to walk just a couple of days earlier. Why would stream depth increase so dramatically in just a couple of days? Snow has long since disappeared from the upland areas of the Martis Creek drainage. I looked at stream flow for August 13 (Refer to Attachment 3), and noticed that the stream flow that day was quite variable.

These measurements from USGS may not be an accurate reflection of the stream flow in the Martis Valley because of the sampling location. However, they do seem to reinforce two observations made by those who see the Martis Creek daily:

- The Martis Creek drainage system is unusually dry, even for a drought year.
- Water levels fluctuate, sometimes dramatically, on a daily basis. Since we've had neither rain, nor snowmelt for some time; the fluctuation would not appear to be natural.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

The Preferred Plan for the Martis Valley Community Plan Update proposes over 9,000 residential units in the Martis Creek drainage plus untold amounts of commercial development plus open space that requires additional water such as golf courses, snow making and ski slope revegetation. How will you ensure that these uses will not deplete the surface water in this drainage? What kinds of monitoring and analysis have you done to make sure that development existing today is not responsible for the extremely low flows in the Martis Creek system and the fluctuations in creek flow? What type of monitoring and analysis do you propose to make sure that subsequent development does not deplete surface water?

173-2

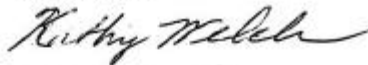
The incredible habitat which we currently enjoy in the Martis Valley is dependent on the surface water in the area. Placer County has an opportunity to preserve this system so that future generations can enjoy the same beautiful and productive place that I value today.

173-3

Thank you for the opportunity to comment on the Plan and the associated DEIR. I request that you revise the DEIR to include these and other comments from the community, and recirculate the revised DEIR so that the community can be reassured that development will not irreversibly alter the Martis Valley and its hydrologic regime.

173-4

Kathy Welch



111 Sandringham Rd.
Piedmont, Ca. 94611

1707 Grouse Ridge Road
Northstar, Truckee
96161

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Attachment 1

*K. Welch letter
8/17/02*

●16050102 Truckee

10338000	TRUCKEE R NR TRUCKEE CA	285
315 1.96	08/17 07:15	
10338500	DONNER C A DONNER LK NR TRUCKEE CA	8.87
1.6 2.78	08/17 03:45	
10338700	DONNER C AT HWY 89 NR TRUCKEE CA	8.41
4.0 3.79	08/17 07:15	
10339400	MARTIS C NR TRUCKEE CA	7.39
3.3 2.05	08/17 05:30	
10340500	PROSSER C BL PROSSER C DAM NR TRUCKEE CA	41.5
34 2.59	08/17 05:30	
10343000	INDEPENDENCE C NR TRUCKEE CA	21.8
2.8 2.20	08/17 03:45	
10344400	LITTLE TRUCKEE R AB BOCA RES NR TRUCKEE CA	80.3
32 .65	08/17 06:45	
10344500	LITTLE TRUCKEE R BL BOCA DAM NR TRUCKEE CA	152
19 .98	08/17 06:30	
10345490	GRAY C NR FLORISTON CA	---
10 2.08	08/17 08:15	
10346000	TRUCKEE R A FARAD CA	517
392 3.49	08/17 03:15	
10347460	TRUCKEE RIVER NR MOGUL, NV	447
266 5.66	08/17 13:00	
10348000	TRUCKEE R AT RENO, NV	258
209 3.73	08/17 13:15	
10348245	N TRUCKEE DRAIN AT SPANISH SPRINGS RD NR SPARK	5.14
23 3.18	08/17 11:45	
10348850	GALENA C AT GALENA C STATE PARK	8.69
4.0 10.44	08/17 13:00	
10349495	STEAMBOAT CK AT GEIGER GD NR STEAMBOAT, NV	6.60
.14 5.65	08/17 10:00	
10349849	STEAMBOAT CK AT SHORT LN AT RENO, NV	16.0
3.0 1.51	08/17 11:45	
10350000	TRUCKEE R AT VISTA, NV	358
156 3.73	08/17 13:00	
10351300	TRUCKEE CA NR WADSWORTH, NV	192
76 8.13	08/17 13:00	
10351600	TRUCKEE R BL DERBY DAM NR WADSWORTH, NV	82.9

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Real-time data for USGS 10339400 MARTIS C NR TRUCKEE CA

Page 1 of 2

K. Welch Letter
8/17/02

Attachment 2

Water Resources

Data Category:

Real-time

Geographic Area:

Nevada

GO

USGS 10339400 MARTIS C NR TRUCKEE CA

PROVISIONAL DATA SUBJECT TO REVISION

Available data for this site Real-time GO

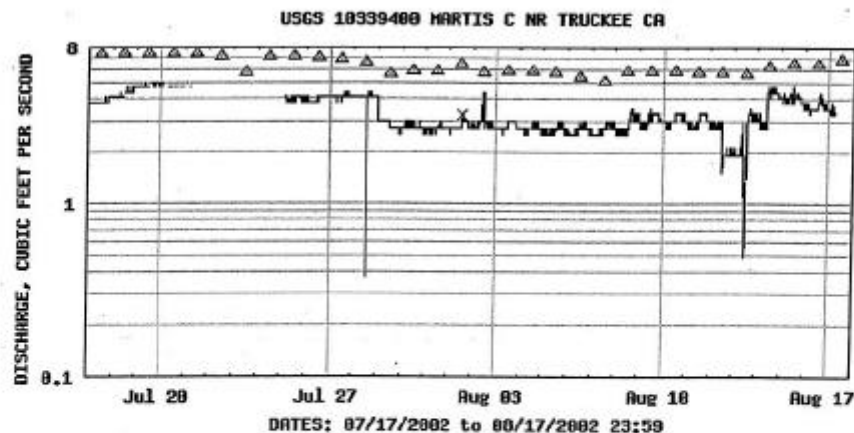
- Current shift-adjusted rating (table format) or (tab-delimited format). These are updated daily and can change often! If you use these ratings it is important that you update often so that you have the most current version. What is a shift-adjusted rating?

During winter months, stage and discharge may be affected by ice in the channel.

Available Parameters All 2 parameters available at this site 00060 DISCHARGE (DD 02) 00065 GAGE HEIGHT (DD 03)	Output format Graph	Days 31 (1-31)	get data
--	-------------------------------	-----------------------------	----------

DISCHARGE, CUBIC FEET PER SECOND

Most recent value: 3.3 08-17-2002 05:30



EXPLANATION

— DISCHARGE

△ MEDIAN DAILY STREAMFLOW BASED ON 41 YEARS OF RECORD

x MEASURED DISCHARGE

[Download a presentation-quality graph](#)

Parameter Code 00060; DD 02

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Real-time data for USGS 10339400 MARTIS C NR TRUCKEE CA

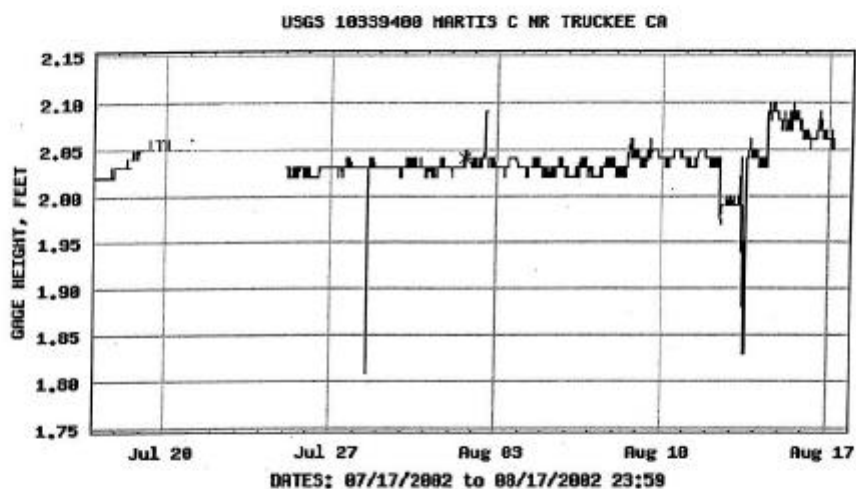
Page 2 of 2

Daily mean flow statistics for 8/17 based on 41 years of record in ft³/sec

Current Flow	Minimum	Mean	Maximum	80 percent exceedence	50 percent exceedence	20 percent exceedence
3.3	1.6	7.39	23	2.92	6.90	10.6
Percent exceedence means that 80, 50, or 20 percent of all daily mean flows for 8/17 have been greater than the value shown.						

GAGE HEIGHT, FEET

Most recent value: 2.05 08-17-2002 05:30



EXPLANATION
— GAGE HEIGHT

x MEASURED GAGE HEIGHT

[Download a presentation-quality graph](#)

Parameter Code 00065; DD 03

Questions about data gs-w-nv_NWISWeb_Data_Inquiries@usgs.gov
Feedback on this website gs-w-nv_NWISWeb_Maintainer@usgs.gov
Real-time Data for Nevada
<http://waterdata.usgs.gov/nv/nwis/uv?>

[Return to top of page](#)

Retrieved on 2002-08-17 17:34:11 EDT
Department of the Interior, U.S. Geological Survey
USGS Water Resources of Nevada
[Privacy Statement](#) || [Disclaimer](#) || [Accessibility](#)
1.26 1.22

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Attachment 3 / USGS 10339400 Martis C Nr Truckee CA.

		Date/Time	Gage Ht. (Feet)	Stream Flow (ft ³ /s)
USGS	10339400	2002-08-13 07:00	2.00	2.10
USGS	10339400	2002-08-13 07:15	2.00	2.10
USGS	10339400	2002-08-13 07:30	1.99	1.90
USGS	10339400	2002-08-13 07:45	1.99	1.90
USGS	10339400	2002-08-13 08:00	2.00	2.10
USGS	10339400	2002-08-13 08:15	2.00	2.10
USGS	10339400	2002-08-13 08:30	2.01	2.30
USGS	10339400	2002-08-13 08:45	2.02	2.50
USGS	10339400	2002-08-13 09:00	2.02	2.50
USGS	10339400	2002-08-13 09:15	2.04	3.00
USGS	10339400	2002-08-13 09:30	2.03	2.70
USGS	10339400	2002-08-13 09:45	2.01	2.30
USGS	10339400	2002-08-13 10:00	1.98	1.70
USGS	10339400	2002-08-13 10:15	1.94	1.10
USGS	10339400	2002-08-13 10:30	1.99	1.90
USGS	10339400	2002-08-13 10:45	1.88	.49
USGS	10339400	2002-08-13 11:00	1.89	.56
USGS	10339400	2002-08-13 11:15	1.91	.74
USGS	10339400	2002-08-13 11:30	1.90	.65
USGS	10339400	2002-08-13 11:45	1.92	.84
USGS	10339400	2002-08-13 12:00	1.95	1.30
USGS	10339400	2002-08-13 12:15	1.92	.84
USGS	10339400	2002-08-13 12:30	1.93	.96
USGS	10339400	2002-08-13 12:45	1.89	.56
USGS	10339400	2002-08-13 13:00	1.83	
USGS	10339400	2002-08-13 13:15	1.83	
USGS	10339400	2002-08-13 13:30	1.84	
USGS	10339400	2002-08-13 13:45	1.83	
USGS	10339400	2002-08-13 14:00	1.83	
USGS	10339400	2002-08-13 14:15	1.96	1.40
USGS	10339400	2002-08-13 14:30	2.03	2.70
USGS	10339400	2002-08-13 14:45	2.04	3.00
USGS	10339400	2002-08-13 15:00	2.04	3.00
USGS	10339400	2002-08-13 15:15	2.04	3.00
USGS	10339400	2002-08-13 15:30	2.04	3.00
USGS	10339400	2002-08-13 15:45	2.04	3.00
USGS	10339400	2002-08-13 16:00	2.05	3.30
USGS	10339400	2002-08-13 16:15	2.05	3.30
USGS	10339400	2002-08-13 16:30	2.05	3.30
USGS	10339400	2002-08-13 16:45	2.05	3.30

K. Welch Letter
8/17/02

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 173: KATHY WELCH, RESIDENT

Response 173-1: Comment noted. The commenter is referred to Master Response 3.4.4 (Water Supply Effects of the Project).

Response 173-2: The commenter is referred to Master Response 3.4.4 (Water Supply Effects of the Project).

Response 173-3: The commenter is referred to Master Response 3.4.4 (Water Supply Effects of the Project).

Response 173-4: The commenter is referred to Master Response 3.4.4 (Water Supply Effects of the Project). The County considers the Draft EIR and the Revised Draft EIR adequate for consideration of the Martis Valley Community Plan and in compliance with CEQA.

Aug-16-02 02:10P

Letter 174

P. 01



Sierra Watch

FAX COVER SHEET

To: Lori Lawrence at 530-889-7499

From: David Welch for Sierra Watch

August 16, 2002

Via Fax

Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

Re: Draft Environmental Impact Report for the Martis Valley
Community Plan

Dear Ms. Lawrence:

Please find attached a Facsimile copy of an original letter sent to you today by
Federal Express.

Thank you for your assistance in processing our comments.


David Welch

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Aug-16-02 02:10P

P.02



Sierra Watch

August 16, 2002

Via Federal Express

Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

Re: Draft Environmental Impact Report for the Martis Valley
Community Plan

Dear Ms. Lawrence:

Sierra Watch appreciates the opportunity to comment on the Draft Environmental Impact Report for the Martis Valley Community Plan. Our detailed comments are provided under separate cover and will arrive from the office of Shute, Mihaly & Weinberger L.L.P. However, we would like to preface the letter with more general comments on the process of completing the Community Plan for Martis Valley.

174-1

The Placer County Board of Supervisors is to be commended for:

- Adopting policies that are highly protective of natural resource in the County in the 1994 Placer County General Plan;
- Initiating the update of the 1975 Martis Valley Community Plan by Resolution dated (August 19, 1997);
- Entering into a Memorandum of Agreement (MOA) with the Resource Agencies to prepare a Natural Communities Conservation Plan (NCCP) for Placer County; a nationwide model for conservation planning;
- Proposing policies in the Proposed Martis Valley Community Plan update that are highly protective of natural resources; and
- Initiating the preparation of an Open Space Mitigation Fee program.

174-2

Sierra Watch supports the completion of an updated Community Plan for the Martis Valley. An updated Community Plan is required for at least three reasons. First, the 1975 Martis Valley Community Plan (current Community Plan) fails to provide a current vision for the valley. Second, in combination with the 1994 Placer County General Plan, the current Plan fails to provide a legally adequate General Plan. Third, these plans in combination fail to provide a legal basis for approval of development projects in the valley. Therefore, an updated Community Plan is required.

1

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Aug-16-02 02:11P

P.03

In addition to the need for an updated Community Plan, there are a number of reasons to support a revised process. First, the proposed Martis Valley Community Plan Land Use Diagram is not consistent with the policy direction of either the Placer County General Plan or the Proposed Plan in numerous respects. Therefore adoption of the Proposed Plan would preclude a 'Conservation Plan' outcome. Specifically, the Land Use Diagram does not specify, as is required by the MOA mentioned above, areas that are high integrity, long-term conservation value, or are otherwise unique and valuable, for permanent protection within the Plan area. Without identifying such areas, implementation of the Proposed Plan would make it impossible to successfully implement the NCCP mentioned above.

174-2
Cont'd

Second, the DEIR for the Proposed Martis Valley Community Plan is not adequate and will require recirculation. However, this time provides an opportunity for the County to follow a different path toward completion of the Plan. The County should participate in a stakeholder driven dialogue to develop a Land Use Diagram that is consistent with the visionary Conservation Planning processes that the Board has agreed to participate in.

174-3

The additional time required to revise the Land Use Diagram and DEIR provides the County the opportunity to follow a model process for the completion of the plan. Sierra Watch recommends an alternative process to be conducted as follows:

- Initiate a stakeholder dialogue (including relevant major resource agencies such as the U.S. Fish and Wildlife Service, Department of Fish and Game, Lahontan Regional Water Quality Control Board, landowners, Nevada County, the Town of Truckee, major community and environmental groups, and Placer County);
- Fill some of the critical data gaps needed to inform a Conservation Alternative as part of the first phase of the NCCP program for eastern Placer County;
- Develop a Conservation Alternative with the stakeholder group that does not preclude completion of the NCCP process after Plan adoption;
- Develop a Proposed New Alternative as part of the Community Plan Update;
- Revise and recirculate the DEIR based on the New Alternative Land Use Diagram;
- Adopt an updated Community Plan; and
- Complete the NCCP process for eastern Placer County.

174-4

Such a process will ensure that the valuable resources in the Martis Valley have been adequately considered before a Plan for the valley's future has been implemented. In addition, this process will expedite completion of an adequate Community Plan necessary for project approval in Martis Valley.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Aug-16-02 02:11P

P.04

Please keep the following persons informed about all matters concerning the Martis Valley Community Plan:

David Welch
Sierra Watch
111 Sandringham Road
Piedmont, CA 94611

Terry Watt
Terrell Watt Planning Consultants
1757 Union Street
San Francisco, CA 94123

Richard Taylor
Janette Schue
Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, CA 94102

Sincerely yours,



David Welch
President, Sierra Watch Board of Directors

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 174: DAVID C. WELCH, SIERRA WATCH

Response 174-1: Comment noted. Since no comments regarding the adequacy of the Draft EIR were received, no further response is required.

Response 174-2: The commentor is referred to Master Response 3.4.1 (Project Description Adequacy) regarding Placer Legacy and 3.4.5 (Adequacy of the Alternatives Analysis).

Response 174-3: Comment noted. The County considers the Draft EIR and the Revised Draft EIR adequate for consideration of the Martis Valley Community Plan and in compliance with CEQA.

Response 174-4: The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis).

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 175

Comment on the Public Review Draft Martis Valley Community Plan

PLACER COUNTY
DATE
RECEIVED

AUG 19 2002

I support the following policies, all of which are in the current draft of the Martis Valley Community Plan:

- Protecting the scenic Martis Valley floor from development.
- Prohibiting "big box" developments by limiting single use commercial square footage to no more than 35,000 square feet.
- Protecting the Martis area's rural nature with rural land use designations.
- Requirements for providing employee housing, and incentives to build affordable housing.
- Increased transit opportunities.
- Protection of open space, inter-connecting large tracts of open space with trails.
- Small, neighborhood commercial centers designed to provide nearby convenience services and reducing the need to use automobiles.
- Policies that require new developments to pay their fair share of road improvements.
- Protecting downtown Truckee by recognizing it as the commercial heart of the Martis Valley area.
- County cooperation with the neighboring jurisdictions of Truckee and Nevada County on planning issues.

Further comments (Use back of paper if needed):

175-1

THESE ADDITIONS + IMPROVEMENTS CAN ONLY
ENHANCE THE NATURAL SETTING IN WHICH THEY ARE BUILT.
AFFORDABLE + EMPLOYEE HOUSING ISSUES ARE CRITICALLY
NEEDED AND SHOULD BE EXPEDITED.

SIGNED: _____

DATE: 12 AUG 02

ROBERT HAMILTON

550-0875

Name (Please print clearly)

e-mail or phone

Box 4263

Address

TRUCKEE

CA

96160

City

State

Zip

IMPORTANT—Mail before August 19

To: Placer County Planning Department, 11414 B Avenue, Auburn, CA 95603
Or e-mail your comments to: planning@placer.ca.gov
The Placer County Planning Department phone number is 530-889-7470.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 175: **ROBERT HAMILTON, RESIDENT**

Response 175-1: The commentor supports County policies in the Martis Valley Community Plan and feels that the document does a fair job of balancing environmental, recreational, and economic interests. The commentor also feels that the affordable housing and employee housing issues are critically needed and should be expedited. No further response is necessary.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 176

RECEIVED

AUG 13 2002

EAST WEST PARTNERS

Comment on the Public Review Draft Martis Valley Community Plan

PLACER COUNTY
DATE RECEIVED
AUG 13 2002
PLANNING DEPARTMENT

I support the following policies, all of which are in the current draft of the Martis Valley Community Plan:

- Protecting the scenic Martis Valley floor from development.
- Prohibiting "big box" developments by limiting single use commercial square footage to no more than 35,000 square feet.
- Protecting the Martis area's rural nature with rural land use designations.
- Requirements for providing employee housing, and incentives to build affordable housing.
- Increased transit opportunities.
- Protection of open space, inter-connecting large tracts of open space with trails.
- Small, neighborhood commercial centers designed to provide nearby convenience services and reducing the need to use automobiles.
- Policies that require new developments to pay their fair share of road improvements.
- Protecting downtown Truckee by recognizing it as the commercial heart of the Martis Valley area.
- County cooperation with the neighboring jurisdictions of Truckee and Nevada County on planning issues.

Further comments (Use back of paper if needed):

176-1 I view this as positive controlled growth
with a much more accurate, complete and current
plan than the 1975 version. I use the metaphor that
I have grown my child to 10 years of age where I like

SIGNED: William G. Goodwin DATE: 8/12/02
WILLIAM G. GOODWIN bgoodwin@brothercreek.com
Name (Please print clearly) e-mail or phone
P.O. Box 6265
Address
TAHOE CITY, CA 96145
City State Zip

IMPORTANT—Mail before August 19

To: Placer County Planning Department, 11414 B Avenue, Auburn, CA 95603
Or e-mail your comments to: planning@placer.ca.gov
The Placer County Planning Department phone number is 530-889-7470.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

176-1
Cont'd

him, now *I want to stop his growth,
education, training and development. Where
will he be in 20 years. >

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 176: **WILLIAM G. GOODWIN, RESIDENT**

Response 176-1: The commentor supports County policies in the Martis Valley Community Plan. The commentor also feels that the plan is a better plan than the 1975 version. No further response is necessary.

Letter 177

Big Springs Property Owners Association

P.O. Box 1315
Truckee, CA 96160
August , 2002

Mr. Fred Yeager
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

PLACER COUNTY
DATE
RECEIVED

AUG 15 2002

FY
PLANNING DEPARTMENT

Re: Martis Valley Community Plan

Dear Sir:

This letter of comment on the Public Review Draft of the Martis Valley Community Plan and the Draft EIR is submitted to you on behalf of the Big Springs Property Owners Association.

I. We are **adamantly opposed** to the Big Springs Drive extension and connection to the proposed Highlands development which is currently recommended by the Department of Public Works. (See page 73 of the Plan.) We disagree with the conclusions made in the Plan "that there are greater benefits and fewer problems." (See page 73) We will discuss these conclusions in greater detail later in this letter of comment.

A. A Bit of History. One of the arcane tenets of land development is "Take whatever is there." This sub rosa tenet is never articulated, never spoken about or written into land development guides but it is a tenet widely held and followed by developers. There is a long history of its usage beginning with the first colonists in America who took from the Indians.

What is here for the taking in Northstar? Here for the taking is **Big Springs Drive.**

The Big Springs Property Owners Association was formed precisely to prevent the taking of Big Springs Drive in the proposed future development of Northstar. The taking of Big Springs Drive was to be accomplished by converting it from the only means of ingress and egress for the community neighborhoods of Gold Bend Condominiums (127 condo families), Indian Hills Condominiums (140 condo families), the Martis Landing Network (approximately 200+ single unit resident families) and the Big Springs Network (approximately 185+ properties for single unit residences when built out) into a **main access road** for the all of these

177-1

communities and in addition the proposed so called Highlands development of 2,200+ family units. Such a taking would involve a radical change in what the Big Springs community had and the impact on such community would be massive. Thus, negotiations began immediately with the developers, Booth Creek and East West Partners in an attempt to head off this devastatingly destructive taking.

Ultimately an agreement was reached satisfactory to the developers and the Big Springs residents, providing:

"Access through the Big Springs sub division to the upper development areas of the Northstar project would be restricted to emergency, fire and life safety purposes. Such restriction would be appropriately documented and recorded."

Booth Creek and East West Partners have in good faith abided by the provisions of that agreement.

B. The New Taking of Big Springs Drive. Now comes the Martis Valley Community Plan stating:

"Big Springs Drive is classified as a collector road and will extend from its current termination south to the Highlands Development as a **full** connection. In addition this roadway will tie-in with Schaffer Mill Road pedestrian, bicycle, transit, emergency access corridor." (See page 74. Emphasis added)

In other words the County proposes to drive what amounts to an informal freeway through the very center of the Big Springs Community. There is no "benefit" to Big Springs residents, only burdens, the additional traffic generated by providing two way access to 2,200 additional family units. Currently construction vehicles utilize Big Springs Drive to reach construction sites. One only has to walk on Big Springs Drive during the peak construction entry times to note the constant stream of vehicles speeding at rates of 50+ mph up that Drive. The current speed limit is 25 mph. If the Big Springs "roadway" is built we see no reason to believe that there will be less speeding on that Drive. There certainly will be more excessive speed in both directions. It may become necessary to install speed bumps every 400 yards to slow speeding.

While we do not purport to represent the residents of the Martis Landing communities it is difficult to see what "benefits" these 470+ residents will enjoy when they try to enter and exit their community onto a "roadway" encountering heavy traffic in both directions. Is a roundabout in

177-1
Cont'd

addition to the one at Northstar Drive and Big Springs Drive proposed to solve this "problem"?

The new taking of Big Springs Drive is being orchestrated by the Public Works Department and the County Planning Commission, government agencies which owe a duty to ascertain the impact of development on the residents directly affected. We are not aware that any residents of Big Springs have been consulted as to the impact of the Big Springs "roadway". We also are not aware of any discussion detailing just what "the greater benefits and fewer problems" exactly are, other than that categorical assertion made on page 73 of the Martis Valley Community Plan.

177-1
Cont'd

C. All Associations and Internal Agencies Connected with Northstar Oppose the Big Springs Drive Proposal. The Northstar Property Owners Association, Northstar Community Service District and the Developers have expressed their opposition to this Proposal. Those most affected by the proposal are opposed, yet no consideration of this opposition is reflected in the County's position. Why not? The duty of the County to citizens is not merely to hear the views of those most directly affected but that duty extends to "listen" to those views, *i.e.* to thoughtfully consider those views. We submit that the County has not listened to those most directly affected by the Big Springs Drive proposal.

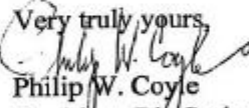
D. Reduction in Property Values. The possibility of a thoroughfare with the consequent, appalling increase of constant, heavy traffic through the center of the Big Springs community has already negatively impacted property values at Big Springs. Brokers insist on disclosing the fact that Big Springs Drive may become a main access roadway to the proposed Highlands Development above Big Springs. This reduces prices prospective buyers are willing to pay for property in Big Springs. The thoroughfare will destroy the tree lined, park like atmosphere that Big Springs Drive as an entryway gives to the whole area. The appeal of the present quiet beauty that now prevails in Big Springs will no longer exist.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

E. Conclusion. We remain opposed to the Big Springs Drive proposal to extend its current termination point and make it a **full** connection to the proposed Highlands Development. We do not oppose a restricted roadway there, to be used only for emergency, fire and life safety purposes.

177-1
Cont'd

Very truly yours,



Philip W. Coyle
President, Big Springs Property Owners
Association

cc: Board Of Supervisors, Placer County
Steve Kastan, Tahoe Field Deputy for Supervisor Bloomfield
Paul Rouser, Manager, Northstar Community Services District
Tim Silva, General Manager, Northstar at Tahoe
Board Of Directors, Northstar Property Owners Association
Roger Lessman, East West Paartners

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 177: PHILIP W. COYLE, BIG SPRINGS PROPERTY OWNERS ASSOCIATION

Response 177-1: The commentor's statements regarding the Martis Valley Community Plan associated with potential connection to Big Springs Drive are noted and will be forwarded to the Placer County Planning Commission and Board of Supervisors as part of project consideration. The commentor is referred to Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis).

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 178



Fine Arts Packing, Crating, Climate Control Storage and Transportation

Fred Yeager, Planning Director
Placer County Planning Department
11414 B Ave
Auburn CA 95603

PLACER COUNTY
DATE
RECEIVED

AUG 16 2002

PLANNING DEPARTMENT

I am writing to express my out right concern for the proposed DEIR. This plan is all about development and the destruction of this great area. These are some of the problems that I believe have not been considered in the plan.

- #1 Destruction of Martis Lake. The lake has already been hurt by adjacent golf courses and use of ground water
- #2 Far too much traffic caused by construction projects and additional housing
- #3 Air pollution caused by too many additional houses and traffic
- #4 Too much development, this is not an extension of Sacramento
- #5 Loss of habitat and grazing due to too many golf courses and housing
- #6 Added run off into Truckee and maybe lower flows due to increased water use and drainage runoff
- #7 Far too much water usage due to over development in housing

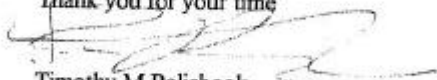
178-1

It is time to say no to special interest groups (i.e. developers) and do what is right for the area. Which is, protect it.

The total build out should be reduced by at least 50%. The amount of golf courses be reduced to 0.

I believe there should be a special regulation and protection for Martis Lake and the city of Truckee.

Thank you for your time


Timothy M Polishook
Property owner Northstar

cc. Board of Supervisors

P.O. BOX 1176 SOUTH SAN FRANCISCO, CALIFORNIA 94083
PHONE: (650) 952-0100 FAX (650) 952-8958

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 178: **TIMOTHY M. POLISHOOK, SHIP/ART INTERNATIONAL, INC.**

Response 178-1: The commentor is referred to Master Responses 3.4.3 (Water Quality), 3.4.4 (Water Supply Effects of the Project) and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR), as well as the policies and mitigation measures contained within Section 4.7 (Hydrology and Water Quality) and Section 4.9 (Biological Resources) of the Draft EIR. The commentor feels that the total buildout should be reduced by at least 50 percent and no golf courses should be allowed. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Lori Lawrence - MARTIS VALLEY COMMUNITY PLAN Update Draft EIR

Page

Letter 179

From: <Bradharlan@aol.com>
To: <LJLawren@placer.ca.gov>
Date: 8/19/02 3:28PM
Subject: MARTIS VALLEY COMMUNITY PLAN Update Draft EIR

Dear Ms. Lawrence:

I have reviewed the DEIR and appreciate all the work and effort that went into it.

179-1

However, I think the report is inadequate and incomplete. The conclusions of the report indicate that an analysis involving development of fewer units is indicated.

I am particularly concerned about the effects on Air Quality and Traffic. The report does not adequately address air pollution. It states that "Summertime emissions of ozone precursors as a result of subsequent development under the Proposed Land Use Diagram would exceed the Placer County APCD's thresholds of significance", but the report states only that mitigation measures will be developed. Information is therefore not available to alleviate concerns about air pollution.

179-2

The section on Transportation points out that Placer County has no way of assuring that 267 will be widened to 4 lanes, since this is under the control of Caltrans (page 4.4-57). To my knowledge, Caltrans has shown little, if any, interest in participating in the planning for the future of Martis Valley, since they were repeatedly asked to attend the meetings of the Citizens' Advisory Committee, and never did. I am against the widening of 267, but to approve development that is contingent on that widening, when there is no assurance that the widening would ever occur, is certainly folly.

179-3

I think a far better approach would be to use this DEIR to identify those most critical areas that would be affected, and then choose one or more of these areas as the basis for the determination of the maximum amount of development that could be tolerated. For instance, one could take the present roadway system and determine what level of development is compatible with 267 remaining a 2 lane roadway.

179-4

I think the Placer County Planning Commission should request revision of the EIR.

179-5

Sincerely,
Bradley J Harlan

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 179: BRADLEY J. HARLAN, RESIDENT

Response 179-1: The commentor states that the Draft EIR is inadequate and incomplete in regards to the number of units. The commentor is referred to Master Response 3.4.2 (Assumptions Used for Development Conditions in the Plan Area).

Response 179-2: The commentor is referred to Master Responses 3.4.6 (Consideration of Impacts to the Tahoe Basin), 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR), and 3.4.10 (Adequacy of the Traffic Impact Analysis), as well as sections 4.4 (Transportation and Circulation) and 4.6 (Air Quality) of the Draft EIR regarding concerns relating to air quality and traffic impacts from the proposed project.

Response 179-3: The commentor is referred to Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis) and Section 4.4 (Transportation and Circulation) of the Draft EIR for concerns relating to traffic issues on SR 267.

Response 179-4: The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis).

Response 179-5: The commentor requests that the County prepare a revised Draft EIR and recirculate it to the public. The County considers the Draft EIR and Revised Draft EIR adequate for consideration of the project and consistent with the requirements of CEQA.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 180

August 19, 2002

Lori Lawrence
Placer County Planning Department
11414 "B" Avenue
Auburn CA 95603

Dear Lori:

I appreciate the opportunity to comment on the Martis Valley Community Plan. Please respond to the following comments on potential omissions in the draft EIR. Section 15086 of the California Code of Regulations states, in part:

(a) The Lead Agency *shall consult with* and *request comments on* the draft EIR from:

- ...
- (3) Other state, *federal*, and local agencies which exercise authority of resources which *may be affected by the project*.

The Army Corps of Engineers has jurisdiction over Martis Creek Lake and Martis Creek Dam. The Martis Valley Community Valley Plan Update identifies the Corps as a Known Responsible and Trustee Agency at Section 1.2.

The Corps' Regional office has no record of receiving the draft EIR. It was not asked to comment on the addition of holding capacity for 9200 homes, golf courses and ancillary facilities. Accordingly, it made no comments.

This is a fatal flaw in the draft EIR for the following reasons:

- 1) Essentially all of the Planning Area is tributary to Martis Creek. Runoff is the source of Martis Creek Lake. The Corps' flood control dam is between Martis Creek Lake and the Teichert Aggregates pit. It has experienced seepage at its foundation for years. Water level behind it has been maintained at minimum pool level for that reason. Addition of vast areas of impervious surfaces on roads, roofs, and parking lots accompanying a potential addition of 9200 homes will lead to a significant increase of the water level of Martis Creek Lake. Safety of the Martis Creek dam has not been identified as a potential impact, yet its existence is critical to the Truckee River Compact and safety of downstream communities.
- 2) Maintenance of water quality standards in Martis Creek Lake is the responsibility of the Corps and the Lahontan RWQCB. It is reported as slowly deteriorating. Its deterioration also affects downstream riparian users. The draft EIR fails to identify that deterioration as affecting the "maintenance of a quality environment as mandated by Section 21000 of CEQA.

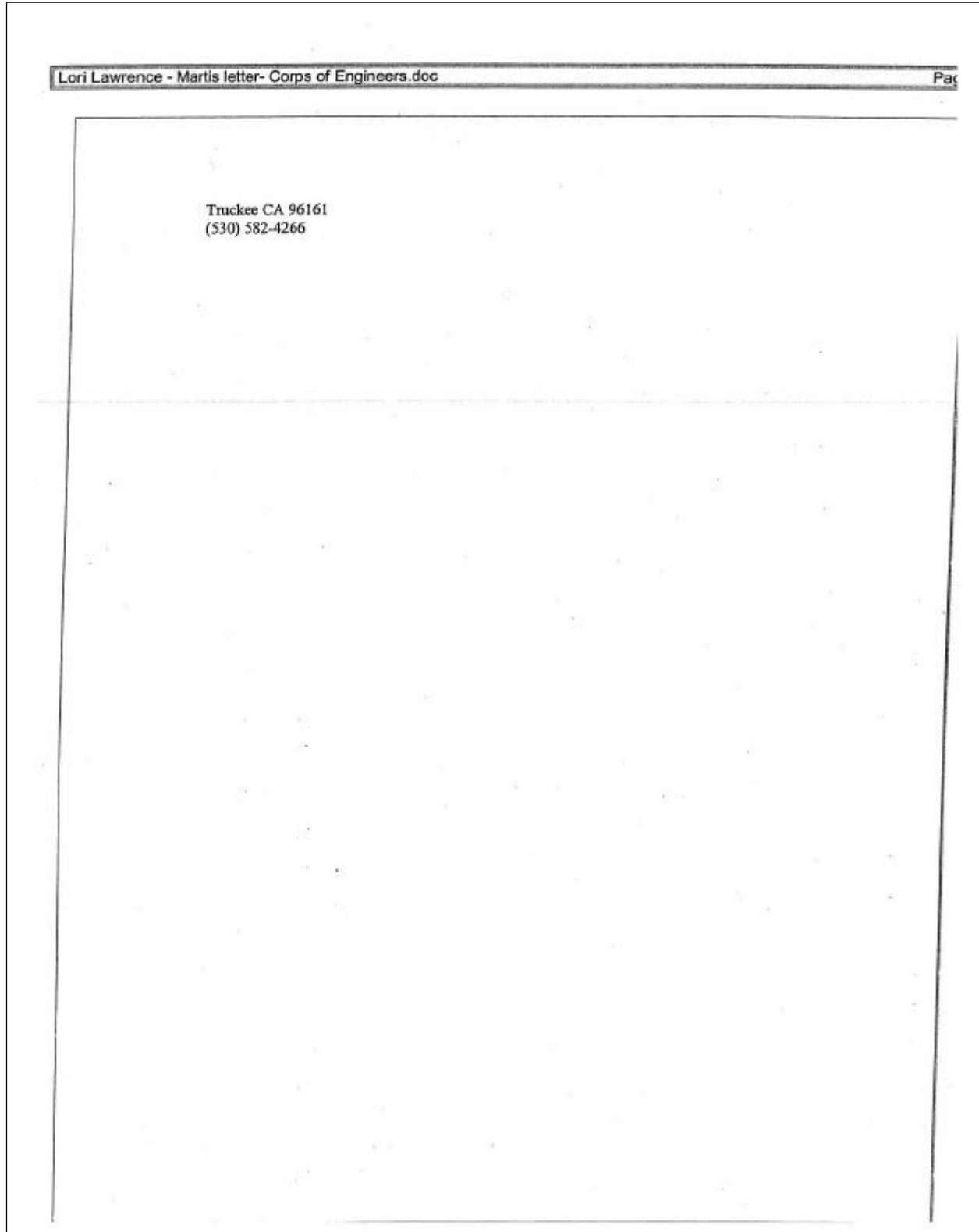
Sincerely,

Tracy R. Cuneo

Tracy R. Cuneo
14030 Swiss Lane

180-1

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR



3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 180: **TRACY R. CUNEO, RESIDENT**

Response 180-1: The commentor questions why the Army Corps of Engineers was not consulted during the preparation of the Draft EIR. The U.S. Army Corps of Engineers was sent a copy of the Draft EIR for review and comment. Additionally, the Annual Water Quality Report, Martis Creek Lake, published by the U.S. Army Corps of Engineers, was used to prepare the Final EIR. Furthermore, the Martis Valley Community Plan does not propose any development on or alteration of the Corps property. In response to the concerns regarding safety of the Martis Creek dam and downstream impacts, the commentor is referred to Master Responses 3.4.3 (Water Quality) and 3.4.4 (Water Supply Effects of the Project), as well as Section 4.7 (Hydrology and Water Quality) of the Draft EIR.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Lori Lawrence - MARTIS VALLEY COMMUNITY PLAN

Page

Letter 181

From: <MSparks457@aol.com>
To: <LJLAWREN@PLACER.CA.GOV>
Date: 8/19/02 1:50PM
Subject: MARTIS VALLEY COMMUNITY PLAN

From: Margaret J. & John E. Sparks, 2700 Spear Street Tower, One Market, San Francisco, CA 94707, August 19, 2002

To: Placer County Planning Department

Ladies & Gentlemen:

We are owners of a residence at 1407 Oxen Run, Northstar. We have been property owners at Northstar for 27 years. We offer the following comments on the recently promulgated update of the Martis Valley Community Plan ("Plan").

As an overview, the Plan starts from the premises and assumptions of the 1975 Martis Valley Plan, which have long since been demonstrated to be erroneous, and then assumes the conclusion that a predetermined amount of development in the Martis Valley over the next 20 years should be permitted for economic reasons wholly apart from the impact on the environment. The environmental issues and the objectives of SEQA and other environmental statutes, both state and federal, are buried in a sea of words that do not fairly identify, address or analyze the environmental issues.

(Continued in separate Email)

CC: <JSPARKS@BROBECK.COM>

181-1

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 181: **MARGARET J. AND JOHN E. SPARKS, RESIDENTS**

Response 181-1: The commentor is referred to Master Responses 3.4.1 (Project Description Adequacy), 3.4.2 (Assumptions Used for the Development Conditions in the Plan Area), and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR).

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Lori Lawrence - MARTIS VALLEY COMMUNITY PLAN, CONTINUED

Pa

Letter 182

From: <MSparks457@aol.com>
To: <LJLAWREN@PLACER.CA.GOV>
Date: 8/19/02 1:50PM
Subject: MARTIS VALLEY COMMUNITY PLAN, CONTINUED

Margaret J. & John E. Sparks
August 19, 2002

Placer County Planning Department

Among the many specific flaws in the Plan are the following:

- | | |
|---|--------|
| 1. The Plan's goals and objectives are not shown to be consistent with the interests of the present residents and home owners in the Martis Valley community or with the preservation of the environmentally objective needs of the present Martis Valley community. | 182-1 |
| 2. The Plan does not critically evaluate the 1975 Community Plan objectives or their consistency with the appropriate objectives for a present or future plan extending to the year 2020. | 182-2 |
| 3. The project description is incomplete; omitting, for example, the announced plans for addition of 2100 home sites at Northstar among many other things. These critical omissions result in any understatement of the environmental impacts of the development. | 182-3 |
| 4. The Plan fails to include a range of reasonable alternatives. The alternatives adopted omit consideration of a significantly reduced development project from that contemplated by the 1975 Community Plan. | 182-4 |
| (a) The "No Project Alternative" erroneously fails to include the cumulative environmental impact of the 1975 Martis Valley Plan. | 182-5 |
| (b) The "Reduced Intensity Alternative" omits features reasonably suggested by commentators, including a no development project alternative. | 182-6 |
| 5. The full extent of environmental impacts is not disclosed. | 182-7 |
| 6. The full extent of cumulative impacts is not identified or analyzed. For example, the analysis of cumulative impacts omits consideration of the as yet unrealized impact of the development contemplated by the 1975 Martis Valley Plan or of the developments heretofore completed pursuant to that plan. | 182-8 |
| 7. The conclusions in Sections 4.1, 4.4, 4.5, 4.6 and 4.12 that the various environmental degradations there described are both significant and "unavoidable" are irrational and unsupported by substantial evidence or analysis. | 182-9 |
| 8. The conclusions in Section 4.9 that the impact of the development on various biological resources will be less than significant in the light of proposed policies, implementation programs and mitigation factors are irrational and unsupported by substantial evidence or analysis. | 182-10 |
| 9. The Plan acknowledges that the proposed development will result in significant impact on surface water quality, provides no evidence that available water tables and surface water in the Martis Valley will not be | 182-11 |

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 182: MARGARET J. AND JOHN E. SPARKS, RESIDENTS

- Response 182-1:* Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.
- Response 182-2:* Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.
- Response 182-3:* The commentor is referred to Master Responses 3.4.1 (Project Description Adequacy), 3.4.2 (Assumptions Used for the Development Conditions in the Plan Area), and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR).
- Response 182-4:* The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis).
- Response 182-5:* The commentor is referred to Response to Comment 182-4.
- Response 182-6:* The commentor is referred to Response to Comment 182-4.
- Response 182-7:* The commentor states that the full extent of environmental impacts is not disclosed, but the commentor fails to identify the inadequacy of the Draft EIR. The commentor is referred to Sections 4.1 through 4.12 of the Draft EIR, which include an extensive analysis of the environmental impacts associated with implementation of the Martis Valley Community Plan per CEQA. No further response is necessary.
- Response 182-8:* The commentor is referred to Master Response 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR).
- Response 182-9:* The commentor states that the “significant and unavoidable” impacts identified in Sections 4.1, 4.4, 4.5, 4.6, and 4.12 are irrational and unsupported by substantial evidence or analysis. The commentor fails to identify how the conclusions are irrational and unsupported by evidence or analysis. The commentor also does not recommend how the analysis, mitigation measures or conclusions could have been different than those contained in the Draft EIR. No further response is necessary.
- Response 182-10:* The commentor states that the “less than significant” impacts identified in Section 4.9 are irrational and unsupported by substantial evidence or analysis. The commentor fails to identify how the conclusions are irrational and unsupported by evidence or analysis. The commentor also does not recommend how the analysis, mitigation measures or conclusions could have been different than those contained in the Draft EIR. No further response is necessary.
- Response 182-11:* The commentor is referred to Master Response 3.4.4 (Water Supply Effects of the Project).

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Response 182-12: The commentor is referred to Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis).

Response 182-13: The commentor requests that the County prepare a revised Draft EIR and recirculate it to the public. The County considers the Draft EIR adequate for consideration of the project and consistent with the requirements of CEQA.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 183

PLACER COUNTY
DATE
RECEIVED

AUG 19 2002

Monday, August 12, 2002

PLANNING DEPARTMENT

Planning Department Placer County
11414 B Ave
Auburn, CA 95603

Gentlepersons:

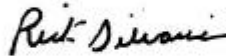
I read and watch with dismay at the numerous development projects that appear to be slated for the Martis Valley, which will impact the owners of Northstar properties. Of particular concern to me is the proposal to connect the road from Big Springs Rd. to Schaffer Mill Rd. I understand the need for a secondary road for emergency access, but am firmly opposed to allowing it to be used to shuttle owners or renters from another development to Northstar. We owners of Northstar property paid a premium for the serenity and convenience of access to Northstar and its amenities, not the least of which is its many quiet areas due to roads not being "connector roads."

183-1

If the developers of the pending Martis Valley projects want their prospective buyers to have access to ski, then let them come into an improved Northstar Dr. parking area by shuttle service from their respective developments. Do not allow the overdevelop of this valley because the beauty and relative limited population is what makes it so appealing. Overdevelop it and you will be left with a "flatland" type urban mess and declining tax revenue from declining property values.

Thank you for your consideration to my concerns.

Sincerely,



Rick Silvani
1808 Woods Point Way
Northstar

925-945-7881 home number
510-635-7700 ex 120 work

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 183: **RICK SILVANI, RESIDENT**

Response 183-1: The commentor is referred to Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis).

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 184

Placer County Planning Dept.
11414 "B" Ave.
Auburn, Ca. 95603

Marvin and Mary Carash
2424 Harrisburg Ave.
Fremont, Ca. 94536

PLACER COUNTY
DATE
RECEIVED

AUG 19 2002

CL

Re: Martis Valley Community Plan and DEIR

PLANNING DEPARTMENT

We own a home in Carnelian Bay, along with my two sisters and their families and my mother. Our home is used during all four seasons by each of our families, all of which have adult children. And as is the case with thousands of other homes in the region, guests are frequently invited to stay with us. The guests and family members, who often arrive at different times, very frequently come in separate cars. I point this out to underscore the fact that the traffic impact of the proposed 6800 units has been inadequately analyzed.

184-1

This example, along with similar impacts from those homeowners who will rent their homes, and lacking satisfactory data about the existing large and ever growing number of reverse commuters who come from the Reno area (due to the lack of affordable housing in the community), mandate that the number of proposed units and amount of commercial area be substantially reduced. This alternative, a minimum 50 % reduction, should along with "no development" be included as alternates for full analysis in an adequately revised DEIR, one which includes accurate traffic generation data and the impacts therefrom, the impacts of the soon to be opened HWY 267 improvements, plus any other road improvements resulting from this and other already authorized unbuilt developments in the region.

184-2

184-3

In addition, if and when a decision is made to allow some development, it must be conditioned to stagger the number of residential, recreational and commercial building and construction permits over a twenty year period, to minimize or eliminate negative impacts of development on the physical environment and the livability of the Martis Valley-Truckee area, and equally important, on North Shore, from Tahoe City to Incline, particularly the Greater Kings Beach Area. Staggering the permits and commercial and recreational development will allow for accurately evaluating required mitigation measures, changes in the region over time, and the need for modified mitigations/new studies.

184-5

There are, of course, other potentially significant impacts. It is vital to all existing residents, visitors and businesses, let alone newcomers, that the region's water supply is adequate-for domestic use, local fire and wildfire suppression and the ecosystem. The DEIR appears inadequate in that it's focus is too localized and lacks depth. A mistake can't be made in assessing this critical matter.

184-6

Other related subjects in need of deeper analysis include the need for worker housing, increased wildfire danger from too many new units, adequacy of sewage disposal and garbage facilities, potential impacts on Lake Tahoe from increased visitor usage, and impacts on North Tahoe public safety organizations, roads and public utilities. Lastly, for

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

the protection and enjoyment of existing and future residents and visitors, development mustn't be authorized without a more rigorous analysis of impacts on the ecosystem. This project is too big to do otherwise.

184-6
Cont'd

Thank you for the opportunity to comment on this matter. You, the Planning Commission and the Board of Supervisors have not only a legal duty to do the best job possible evaluating and making a decision regarding this project, you have a moral duty to do so - to your friends, to your families, and to yourselves. You have a wonderful opportunity to set a great example for present and future generations to follow. Make us -and yourselves-proud.

184-7

Cordially,



Marvin and Mary Carash

Copy: Sierra Watch

Board of Supervisors

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 184: MARVIN AND MARY CARASH, RESIDENTS

- Response 184-1:* The commentor is referred to Master Responses 3.4.2 (Assumptions Used for Development Conditions in the Plan Area) and 3.4.10 (Adequacy of the Traffic Impact Analysis).
- Response 184-2:* The commentor is referred to Master Response 3.4.8 (Affordable and Employee Housing Effects of the Project).
- Response 184-3:* The commentor is referred to Response to Comment 184-1.
- Response 184-4:* (The comment letter does not include the number 184-4 due to a counting error. Therefore, no response is necessary).
- Response 184-5:* Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.
- Response 184-6:* The commentor is referred to Master Responses 3.4.4 (Water Supply Effects of the Project), 3.4.6 (Consideration of Impacts to the Tahoe Basin), 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR), 3.4.8 (Affordable and Employee Housing Effects of the Project), as well as Section 4.9 (Biological Resources) and Section 4.11 (Public Services and Utilities) of the Draft EIR.
- Response 184-7:* Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 185

Date: July 12, 2002

Attn.: Lori Lawrence
Environmental Review Technician
Placer County Planning Dept.
11414 "B" Ave.
Auburn, Ca. 95603

PLACER COUNTY
DATE
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AUG 19 2002
LL
PLANNING DEPARTMENT

Re: **Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050**

Dear Ms. Lawrence:

Thank you for the opportunity to
comment on the above-referenced Plan Update
and Draft Environmental Impact Report.
Although the Proposed Plan states that the
Placer County portion of the Martis Valley
has an adjusted holding capacity of 9,220
units, certain aspects of the plan may well
induce growth far beyond this number.

185-1

Most of the units in the Proposed Plan
are luxurious second homes or resort
accommodations. This type of development
requires a large service industry which
employs people who cannot usually afford
market-priced housing in this area.
Developers are required to provide a maximum
of only 50% of their employee's housing.
Therefore, many employees must often commute
long distances. However, there is no
analysis of the degradation of traffic or
air quality if employees must commute from
cities such as Reno or Auburn. Nor is there
even an estimate of the number of local
employees who already make similar commutes.
Likewise, there is no analysis of the
infrastructure demands for employees who may

185-2

Re: **Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050**

pg. _____

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

live in to-be-constructed employee housing, for example at the proposed Northstar Employee Housing project. Similarly, the County does not calculate the housing demands for construction workers employeeed in the development of the Proposed Plan. These impacts are potentially significant and should be evaluated as to how they will further degrade traffic service, air quality and habitat and place increased demand on public services.

185-2
Cont'd

185-3

The Proposed Plan does not place limits on growth. Additional roads and infrastructure such as new wellsand water storage units may well induce additional growth beyond the 9,220 units. Moreover, the County has already rezoned property from "forest" to "residential" for employee housing at Northstar. These are growth inducing impacts and must be analyzed.

185-4

185-5

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

pg. _____

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

In addition, because the DEIR is so long and complicated, I request that you extend the period for comments until the end of August, 2002. Furthermore, because of the inadequacy of the DEIR, I request that the DEIR be revised and recirculated.

185-6

Sincerely yours,

(Print Name)

ARLEE BOYD / BIRD

(Print Address)

591 BRASSIE AVE

KINGS BEACH, CA, 96143

Arlee Bird

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

pg. _____

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 185: ARLEE BOYD/BIRD, RESIDENT

- Response 185-1:* The commentor is referred to Master Responses 3.4.2 (Assumptions Used for Development Conditions in the Plan Area) and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR).
- Response 182-2:* The commentor is referred to Master Response 3.4.8 (Affordable and Employee Housing Effects of the Project) and Section 4.2, Housing of the Draft EIR regarding concerns relating to housing. As specifically noted in Master Response 3.4.8, a survey regarding where current employees in the North Tahoe/Truckee area reside was completed in 2002 by the North Tahoe Resort Association. The results of the survey identify that approximately 89 to 91 percent of area employees reside in the North Tahoe/Truckee area. This information is consistent with external traffic distribution assumptions in the Draft EIR, which was the basis of the air quality and noise analyses for project traffic effects.
- Response 185-3:* The commentor is referred to Response to Comment 182-2. As specifically noted on page 3.0-12 and as depicted on Figures 3.0-5 through -8 in Section 3.0 (Project Description) of the Draft EIR, the project includes the Northstar-at-Tahoe employee housing project (Sawmill Heights). The commentor is also referred to Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis) and Sections 4.4 (Transportation and Circulation), 4.6 (Air Quality), 4.9 (Biological Resources), and 4.11 (Public Services and Utilities) of the Draft EIR.
- Response 185-4:* The commentor is referred to Response to Comment 185-1 and pages 7.0-1 through -2 in Section 7.0 (Long-Term Implications) of the Draft EIR regarding growth-inducing impacts.
- Response 185-5:* The commentor is referred to Response to Comments 185-3 and 185-4.
- Response 185-6:* The commentor requests that the County prepare a revised Draft EIR and recirculate it to the public. The County considers the Draft EIR and Revised Draft EIR adequate for consideration of the project and consistent with the requirements of CEQA.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 186

132 Belcrest Drive
Los Gatos, CA 95032
August 14, 2002

Placer County Planning Department
11414 "B" Avenue
Auburn CA 95603

Attn: Ms Lori Lawrence Environmental Review Technician

PLACER COUNTY
DATE
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AUG 19 2002

PLANNING DEPARTMENT

Dear Sirs:

This letter addresses my concerns about the traffic in the Martis Valley based on the Martis Valley Community Plan DEIR and my personal observations and conclusions. In addition this letter asks for comments, clarification and substantiation of statements in the DEIR.

186-1

Traffic in the Martis Valley will increase and the effects of it will be substantial under all of the alternatives discussed and yet there is little if any discussion of mass transit, Park and Ride opportunities or other transportation alternatives. Why are these options not explored more fully?

Why is the largest transportation system currently operating in the Martis Valley ignored? I refer to the Northstar Dial a Bus system that from personal observation is very effective within the resort and results in minimizing traffic on Northstar Drive to everyone's benefit. Will Northstar continue this service? How do we insure that this element of the transportation system is maintained and not abolished in some future cost cutting activity?

186-2

Are there any plans for similar systems within the proposed developments and what would the effect be on traffic if such were required? Because the developers are creating these communities for their gain through the use of these recreational facilities (ski resorts and golf courses) can they be required to provide additional funds to build and support such systems?

Lahontan is essentially a walled community, with very limited access and there is no discussion of how this affects the plan. Does the plan address any additional gated communities? How are the gated communities taxed so that they bear a larger share of the cost for maintaining the roads like Shafer Mill Road that are used almost exclusively to serve as a corridor to an exclusive gated community?

186-3

The approach to analysis of the traffic is detailed and yet is there adequate provision or consideration for the fact that the transportation requirements in the area are substantially different from a suburban or even rural environment. The development of the Martis Valley as proposed is for second homes for people who are seeking special recreational benefits. Isn't this substantially different usage from a rural environment where the

186-4

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

inhabitants are living and working in a more normal day-to-day rhythm? What provisions in the plan recognize this?

186-4
Cont'd

Are there not special requirements which should be considered in such a usage area? Because of this, the average usage over a year may be very low compared with the usage at certain peak times such as Sunday afternoons during the ski season when many people are leaving the area for their primary residence in the San Francisco Bay Area. One of the overriding assumptions on traffic is that these homes because they are second homes will be, on average, lightly occupied. Is that a reasonable assumption for a 25-year plan? My personal experience is there are more homes available for short term seasonable rent than prospective renters at this time. Said another way, if the demand for this available recreation becomes higher because the resort owner's are able to promote it more successfully or if the economy dictates, the use of these houses will increase. What data exists to predict the occupancy rate for various economic situations?

186-5

What will the traffic patterns be between the various proposed communities? I doubt that these patterns fit the same model that would apply if we were discussing housing tracks in the Santa Clara Valley. How is this factored in to the plan?

186-6

The increased housing developments are largely planned for expensive second homes, where will the people who support this infrastructure live and how is that additional traffic considered?

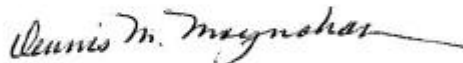
186-7

It is my contention that the plan is allowing aggressive building in an area where the quality of life is an overriding consideration. That quality of life is defined by open space and the maintenance of a mountain forest environment. My experience is that it is that quality that people like myself were trying to capture when they purchased property in the area. While progress, meaning more use of the land by more people, is inevitable; under this plan the rate of growth and the requirements to support this growth will substantially alter the basic area and its appeal.

186-8

I urge the Supervisors of Placer County to consider the magnitude of this requested proposal and reduce it to a more limited scope.

Sincerely



Dennis M. Moynahan

Copy to: Sierra Watch

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 186: DENNIS M. MOYNAHAN, RESIDENT

- Response 186-1:* The commentor is referred to Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis).
- Response 186-2:* The commentor is referred to Response to Comment 186-1.
- Response 186-3:* The commentor is referred to pages 4.11-94 through -97 in Section 4.11 (Public Services and Utilities) for a discussion of road maintenance impacts. The commentor's concern about gated communities is outside the scope of the Draft EIR, as taxation and socioeconomic issues are not evaluated under CEQA. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.
- Response 186-4:* The commentor is referred to Master Responses 3.4.2 (Assumptions Used for Development Conditions in the Plan Area), 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR), and 3.4.10 (Adequacy of the Traffic Impact Analysis).
- Response 186-5:* The commentor is referred to Response to Comment 186-4.
- Response 186-6:* The commentor is referred to Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis).
- Response 186-7:* The commentor is referred to Response to Comment 186-4.
- Response 186-8:* Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 187

Sean Dowdall Letter, August 16, 2002

Attn: Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 "B" Avenue
Auburn, CA 95603

PLACER COUNTY
DATE
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AUG 19 2002

LL
PLANNING DEPARTMENT

Re: Draft Environmental Impact Report ("DEIR") for the Proposed Martis Valley
Community Plan ("MVCP") Update, SCH No.: 2001072050

Dear Ms. Lawrence:

This letter is in addition to my letter dated August 12 and addresses additional concerns I have regarding the Draft Environmental Impact Report (DEIR) for the proposed Martis Valley Community Plan Update (MVCPU).

Water Quality and Quantity:

After reviewing the DEIR, I believe that it has not adequately addressed the following water-related issues and, as such, am requesting that these issues be studied further and a new draft EIR be created for public review: 187-1

- Ongoing monitoring of water supply and quality are not addressed in the DEIR as these issues pertain to the Truckee River-Carson River-Pyramid Lake Water Settlement Act of 1990.
- Various levels and types of major development in the MVCPU should be individually addressed as to the impact on water quality and quantity so that the benefits of the development can be weighed against the impacts. This includes assessments of golf courses, ski area expansion, new subdivisions and commercial development.
- Variability in water supply, from drought to floods, should be studied. The data used appears to be averages, but should include the possibility of multi-year droughts and the water needs of ever growing populations, industry and agriculture in both California and Nevada. Water studies should be conducted to assess and recommend mitigation tactics for all water supply conditions. 187-2
- Waste treatment and water quality are not adequately addressed due to the DEIR's development assumptions, which are far below the limit allowed in the MVCPU. Also, the impact of the MVCPU on adjoining wetlands and the interdependence of these wetlands on the water supply for Martis Valley and the downstream areas of the Truckee River are not adequately addressed.
- It does not appear the US Geological Survey or the Pyramid Lake Paiute Tribe were interviewed and/or consulted for the DEIR. This is an oversight, particularly with the history of sensitivity around these issues. Their input is not only valuable, but critical for the public to fairly interpret and judge the MVCPU.

Sincerely,


Sean Dowdall
2032 Scott Street
San Francisco, CA 94115
415.885.8518

4018 Skiview, Northstar

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 187: **SEAN DOWDALL, RESIDENT**

Response 187-1: The commenter is referred to Master Response 3.4.3 (Water Quality) and 3.4.4 (Water Supply Effects of the Project).

Response 187-2: The commenter is referred to Master Response 3.4.2 (Assumptions Used for Development Conditions in the Plan Area), 3.4.3 (Water Quality) and 3.4.4 (Water Supply Effects of the Project).

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 188

Date: July 12, 2002

Attn.: Lori Lawrence
Environmental Review Technician
Placer County Planning Dept.
11414 "B" Ave.
Auburn, Ca. 95603

PLACER COUNTY
DATE
RECEIVED
AUG 19 2002
LL
PLANNING DEPARTMENT

Re: **Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050**

Dear Ms. Lawrence:

Thank you for the opportunity to
comment on the above-referenced Plan Update
and Draft Environmental Impact Report. I am
particularly interested in the Biological
Resources in the Martis Valley since I
frequently hike in the region.

As I reviewed the description of the
Martis Valley, I was surprised that no
attempt was made to describe the Placer Co.
Portion of the Valley as part of a larger
ecosystem, one that at least included the
watershed of the Truckee River as it flows
through the Valley. Your regional setting
description is simply one of the Sierra
Nevada mountain range. How is it possible to
assess whether proposed development would
have an impact on the vegetation and
wildlife of the Martis Valley if you analyze
the Placer County portion in isolation? For
example, how does the Martis Valley function
as a migration corridor between surrounding
areas for animals such as mule deer? What
width of migration corridor is required for
deer and other migratory species? Isn't
there a more precise method, such as radio

188-1

188-2

Re: **Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050**

pg. 1

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

collars on species of concern, rather than "road kill data", for determining migration corridors? Please describe the regional setting for the Martis Valley in a meaningful way.

188-2
Cont'd

In addition, please use adequate survey techniques to describe migration corridors as well as the presence or absence of animal and plant species of concern. This is especially important since Placer County is embarking on a Habitat Conservation Plan which would protect the diversity of life in this region. Since the studies for the Martis Valley have not been done, it is especially important that the information on biological resources for the Community Plan, which seeks to guide the development of the Valley for the next 20 years, be as detailed and accurate as possible. Unless the County develops more detailed information about species which currently depend on the Martis Valley, and their habitats, it is impossible to identify which land to develop and which land to preserve in order to assure continued survival of plants and animals of concern.

188-3

Since the Lahontan Cutthroat Trout is a federally threatened species, and since sediment and water quality can adversely affect spawning, I request that you analyze how new roads and roadway expansions, which require sanding in the winter, will affect recovery plans for this species. Similarly, the water requirements for recreational uses such as snow-making and golf courses and

188-4

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

pg. 2

their effects on water quality should be analyzed for their effects on the Lahontan Cutthroat Trout in particular, as well as other animal and plant species which might be affected.

188-4
Cont'd

The County relies on policies in the Community Plan to reduce potentially significant impacts on biological resources to less than significant. However, these policies are very vague and defer evaluation of many ecological resources such as wetlands, stream environment zones, habitat for rare, threatened or endangered animals and plants, deer ranges, large areas of non-fragmented natural habitat and wildlife movement zones, until specific development plans for projects are considered. This will be too late to limit development or change development patterns in the Martis Valley so that biological resources are protected. Such an evaluation should be made prior to submission of individual project proposals.

188-5

The logic of the plan is difficult to follow. Why, in the Draft Environmental Impact Report, does mitigation for the Proposed Land Use Diagram result in **less than significant impacts** for individual species of concern; yet, the cumulative impacts are **significant and unavoidable** ? Is this what happens when you look at projects or species in isolation, without considering the broader picture?

188-6

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update. SCH No.: 2001072050

pg. 

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 188: BROOKE DURASTANTE, RESIDENT

Response 188-1: The commentor is referred to Master Responses 3.4.2 (Assumptions Used for Development Conditions in the Plan Area) and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR), as well as Section 4.9 (Biological Resources) of the Draft EIR. Regarding the Truckee River watershed portion of the comment, the commentor is referred to page 3.0-1 in Section 3.0 (Project Description) and page 4.7-1 in Section 4.7 (Hydrology and Water Quality) for a discussion of the Truckee River under "Regional Setting". In Section 4.9 (Biological Resources) the Truckee River watershed is discussed on pages 4.9-82 and -88. Additionally, the commentor is referred to the first page of Sections 3.0 and 4.1 through 4.12 of the Draft EIR for additional regional setting information that is applicable to each issue area.

Response 188-2: The commentor is referred to Response to Comment F-12 and pages 4.9-32 through -33 and pages 4.9-81 through -87 in Section 4.9 (Biological Resources) of the Draft EIR for a discussion of impacts on wildlife movement and migration corridors as well as applicable County policies and implementation programs. The deer migration corridors were mapped using the road kill data from Caltrans in addition to deer track surveys for Hopkins Ranch (Holl, 2002), Eaglewood (North Fork Associates, 2001 and 2002) and Siller Ranch (Jones and Stokes, 2001). The deer track surveys including raking the dirt on the three project sites and evaluating deer tracks during the spring and fall migration. The commentor states that the regional setting should be described in a more meaningful way. The commentor fails to identify how the description of the regional setting could have been improved. No further response is necessary.

Response 188-3: The commentor insinuates that adequate survey techniques (to describe migration corridors and the presence or absence of animal and plant species) were not used to prepare the Martis Valley Community Plan Update and Draft EIR. The commentor is referred to Master Response 3.4.1 (Project Description Adequacy) and Section 4.9 (Biological Resources) of the Draft EIR. Current research was used to prepare this Draft EIR. The commentor is referred to pages 4.9-90 through -91 in Section 4.9 for a list of references used to prepare the Biological Resources section of the Draft EIR. It should be noted that this Draft EIR evaluates the environmental impacts associated with implementing the Martis Valley Community Plan Update. As stated on page 3.0-34, *"Upon certification of this EIR and adoption of the Martis Valley Community Plan, subsequent development and public projects in the Plan area would be evaluated for their consistency with the Plan. In addition, environmental review of subsequent projects in the Plan area that are determined to be consistent with the Martis Valley Community Plan would be subject to the provisions of CEQA and the Placer County Environmental Review Ordinance."* Accordingly, the project applicants of proposed development projects will be required to conduct separate environmental reviews of their projects, which will include a thorough biological impact review of that development using current research and data that is specific to the individual project sites.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

- Response 188-4:* The commentor is referred to Response to Comment K-39. Regarding water quality, the commentor is referred to Master Response 3.4.3 (Water Quality) and Section 4.7 (Hydrology and Water Quality) of the Draft EIR.
- Response 188-5:* The commentor is referred to implementation programs and mitigation measures in Section 4.9 (Biological Resources) of the Draft EIR. Additionally, the commentor is referred to Response to Comment 188-3.
- Response 188-6:* The commentor is referred to Master Response 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR). As stated under cumulative setting, the impacts are not specific to the Martis Valley Community Plan area. The cumulative conditions include proposed and conceptual development in the Martis Valley as well as development allowed under the Town of Truckee General Plan and Nevada County General Plan.
- Response 188-7:* The commentor is referred to Master Response 3.4.9 (Adequacy of the Review Period). The commentor also requests that the County prepare a revised Draft EIR and recirculate it to the public. The County considers the Draft EIR and Revised Draft EIR adequate for consideration of the project and consistent with the requirements of CEQA.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 189

Date: July 12, 2002

Attn.: Lori Lawrence
Environmental Review Technician
Placer County Planning Dept.
11414 "B" Ave.
Auburn, Ca. 95603

PLACER COUNTY
DATE
RECEIVED

AUG 19 2002

PLANNING DEPARTMENT

Re: **Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050**

Dear Ms. Lawrence:

Thank you for the opportunity to
comment on the above-referenced Plan Update
and Draft Environmental Impact Report.
Water quality is of interest to many people
in this area, in part because of the
problems with the Glenshire water supply
containing high levels of arsenic. The
Glenshire situation may be replicated in the
Martis Valley, particularly because several
test wells in the Martis Valley show
unacceptable levels of arsenic, manganese
and radon. Please do the necessary tests to
confirm that the kind of water use predicted
in the Proposed Plan will not result in
elevated levels of arsenic, manganese,
radon, and other hazardous elements in the
ground water supply.

189-1

Substantial acreage (more than 4,000
acres) will be urbanized under the Proposed
Plan. However, not all the sources of
pollutants are identified. For example, the
sediment load from ski runs and bike trails
has not been analyzed. Moreover,
construction sites frequently pollute
waterways, yet no analysis has been done of

189-2

Re: **Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050**

pg. _____

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

the specific kinds and levels of pollutants from construction activities. Please do an adequate analysis of the pollutants, such as sediments, oils, grease, trash, etc., which may arise from ongoing activities such as ski and bike trails and from construction sites. Without this information, it is not possible to meet the water quality objectives and load limitations for sediments which have been set for various water bodies and creeks in the Valley.

189-2
Cont'd

The DEIR relies on deferred policies and mitigations to conclude that the impacts from the Proposed Plan to water quality are less than significant. Unless the County requires specific measures to maintain or improve water quality, such as reducing the development footprint, eliminating golf courses, prohibiting massive amounts of grading, and determining how much true open space buffer is required to protect each water body in the plan area, it cannot logically conclude that the Proposed Plan will have insignificant impacts on water quality. Please include these measures in a revised DEIR to ensure our water quality.

189-3

Finally, although you assume there is some interaction between the upper aquifer, fed by surface waters, and the middle and lower aquifer, which will supply much of the water for the Proposed Plan, you conclude there is insufficient interaction between the two aquifers to permit contamination of ground water supplies by polluted surface water. Please quantify the amount of

189-4

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

pg. _____

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

interaction between the two aquifers so that the public is more certain that our ground water will not be contaminated by surface water.

189-4
Cont'd

In addition, because the DEIR is so long and complicated, I request that you extend the period for comments until the end of August, 2002. Furthermore, because of the inadequacy of the DEIR, I request that the DEIR be revised and recirculated.

189-5

Sincerely yours,

(Print Name) Larry Pollock

(Print Address) Box 4527 INCLINE VILLAGE NV 89450

Larry Mark Pollock

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

pg. _____

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 189: LARRY POLLOCK, RESIDENT

- Response 189-1:* The commentor is referred to Master Responses 3.4.3 (Water Quality) and Section 4.7 (Hydrology and Water Quality) of the Draft EIR regarding concerns relating to water quality.
- Response 189-2:* The commentor is referred to Master Responses 3.4.3 (Water Quality) and Section 4.7 (Hydrology and Water Quality) of the Draft EIR regarding concerns relating to the identification of pollutants from ski runs, bike trails, construction sites.
- Response 189-3:* The commentor is referred to Response to Comment 189-1.
- Response 189-4:* The commentor is referred to Master Responses 3.4.3 (Water Quality), 3.4.4 (Water Supply Effects of the Project), and Section 4.7 (Hydrology and Water Quality) of the Draft EIR.
- Response 189-5:* The commentor is referred to Master Response 3.4.9 (Adequacy of the Review Period). The commentor also requests that the County prepare a revised Draft EIR and recirculate it to the public. The County considers the Draft EIR and Revised Draft EIR adequate for consideration of the project and consistent with the requirements of CEQA.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 190

Ms. Lori Lawrence
Placer County Planning Dept.
11414 B Avenue
Auburn, CA 95603

PLACER COUNTY
DATE
RECEIVED

AUG 19 2002

PLANNING DEPARTMENT

RE: Martis Valley Draft EIR Comments

I am responding to this plan as a concerned citizen of Truckee for the past 17 years and as the Park Ranger for the Army Corps of Engineers at Martis Creek Lake.

Under Goal 1.G:

Policy 1.G.4 states the County shall permanently protect Martis Lake's high quality sport fishery.

This is a contradiction to the whole Plan. How can you possibly think the effect of three more golf courses on Martis Lake can be mitigated? Martis Lake is the watershed for Martis Valley. All golf courses will ultimately have some drainage into the lake, in addition to surface water from all the landscaping of new homes. The lake is far too small to be able to handle the amount of nutrients (organic or chemical) that will result from having five golf courses upstream from it.

190-1

Policy 1.G.5 states that the County will ensure areas of development are subordinate to the creation of interconnected greenbelts and open spaces, which tie together the large expanses of Martis Valley.

You know darn well these private developments are NOT going to let the local riff raff hike in their developments. One developer has already erected a barbed wire fence across a popular trail at the end of Army Corp property on the west side of the valley. Why did they need to put barbed wire there? These are humans and dogs, not cows. They want to make sure people do not encroach on their property or see what they are doing back there. As the head of DMB Highlands, division of Lahontan, who is on the committee for the Plan, said at one of the committee meetings when asked if the citizens of Truckee would be able to use their golf course "not likely". You can be sure the response to hiking thru their development would be the same.

190-2

Policy 1G.1 states The County shall support the preservation and enhancement of natural resources and open space.

What do we need "enhancement" of our natural landforms and resources for?? They are fine the way they are, Mother Nature does not need man to "enhance" her creations. If enhancing means golf courses, then you are obviously in the pockets of the developers for money only and do not care about what really

190-3

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

happens to this area or what the community wants. This much proposed development can only degrade the area's natural resources.

190-3
Cont'd

Policy 1.G.6 States the County shall require new development be designed and constructed to protect, enhance, rehabilitate, restore to the maximum extent feasible.

What does the maximum extent "feasible" mean? If it's not "feasible" to restore and protect you just won't worry about it? Proposing to mitigate the effects of this massive plan at a project level is truly short-sighted and to the advantage of the developers and disadvantage of the affected area.

190-4

Goal 1.H. To preserve and enhance open space for outdoor recreation purposes. (There's that word enhance again)
This is contradictory to everything in the plan.

Policy 1H.2 The County shall encourage the development of the recreation and open space potential of all water features.

190-5

Again, WHY? Why do these features need to be "developed"? They are fine in their wild state. You are setting the stage to destroy our natural features and watersheds, not "enhance" them.

Further, the Truckee airport will of course have to expand to accommodate all the private jets that our 2nd homeowners will need to go back and forth in. The jet traffic is already an obnoxious blight over Truckee, we do not need more jet noise. Studies have shown that air pollution kills trees. Many of the pine trees on Joerger Drive north of the airport (where the planes take off) are dying. Do you think the trees will survive an airport expansion? Not likely. The Martis campground will be highly affected by more air traffic, both noise wise and pollution wise. The trees in this area are already under stress. The recreation experience at the campground will be destroyed if jets start flying in and out of the valley at night.

190-6

Lastly, I don't know if anyone down there in the foothills was able to observe Truckee and North Lake Tahoe on 4th of July weekend. Well I was, it took me 1 hour to get to work on July 4th, from Glenshire to Martis Lake! This was the most crowded July 4th weekend I have seen yet. It took me half an hour to get to work on Friday, July 5. When are all these second homeowners going to be here? On weekends and holidays. The addition of that many more people to our roads will make every intersection a "Z" intersection in one continuous line. Traffic in town has been almost that bad since then. It is very difficult to get anything done in this town or Tahoe City from 4th of July through Labor Day already. How do you think thousands more vehicles can be accommodated by

190-7

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

our road system and why should we enlarge it to try to accommodate more traffic? I'll bet a public opinion poll would not reveal many area residents who want our road system expanded and enlarged to accommodate more second homeowners.

190-7
Cont'd

There are currently 32 projects approved or proposed within the Martis Valley/Truckee area! The last thing this area needs or can handle is another 6,000 homes, plus commercial space, plus a four-lane highway to feed into two lane towns.

190-8

If we wanted to live in a city, we'd live in a city. Don't try to make this beautiful area a city, it is too fragile. Don't let the rich second homeowners, most of which do not care about their second home communities, run out the backbone citizens of our communities. These communities are not necessary to our survival, Placer County has plenty of other income. There are hundreds of homes for sale in the area, including homes at Northstar, Lahontan, Tahoe Donner and the North Shore. People who desire second homes in the Tahoe area can buy an existing million dollar home instead of adding more impact to our fragile area that is already being loved to death.

190-9

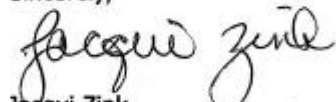
There is **no** good reason for allowing this extent of development in Martis Valley. Please add an alternative to the plan of 1,000 homes, very small commercial, no industrial, and ideally, NO golf courses. Placer County is negligent to even consider proposing this level of development in the fragile environment of Martis Valley and to believe adding that much traffic to Truckee and the north shore can be mitigated by creating a few mile long 4 lane highway. The way the bypass is designed, it is not going to alleviate traffic that much on 267 and a huge bottleneck will result with the four lane merging from Martis Valley into the bypass.

190-10

This plan will be so detrimental to the Truckee/North Shore area, there are almost endless reasons to not consider it. Placer County needs to go back to the community and find out what *our* idea of what we want *our* area to be is, and to stop telling us that all the other studies showing how unfeasible this is are wrong and all your people are right.

190-11

Sincerely,


Jacquie Zink
15603 Archery View
Truckee 96161
587-6030

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 190: JACQUI ZINK, RESIDENT

- Response 190-1:* The commentor is referred to Master Responses 3.4.3 (Water Quality) and Section 4.7 (Hydrology and Water Quality) of the Draft EIR.
- Response 190-2:* Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.
- Response 190-3:* Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.
- Response 190-4:* Comment noted. The commentor is referred to Master Responses 3.4.2 (Assumptions Used for Development Conditions in the Plan Area) and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR).
- Response 190-5:* Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.
- Response 190-6:* The commentor is referred to Response to Comment 9-8.
- Response 190-7:* The commentor is referred to Master Response 3.4.2 (Assumptions Used for Development Conditions in the Plan Area) and 3.4.10 (Adequacy of the Traffic Impact Analysis).
- Response 190-8:* Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.
- Response 190-9:* Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.
- Response 190-10:* The commentor is referred to Master Responses 3.4.5 (Adequacy of the Alternatives Analysis) and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR).
- Response 190-11:* Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 191

Lori Lawrence
Placer County Planning Dept.
11414 B Avenue
Auburn, Ca 95603

Kacey Brown
PO Box 10444
Truckee, CA 96161

PLACER COUNTY
DATE
RECEIVED
AUG 19 2002
LL
PLANNING DEPARTMENT

Dear Ms. Lawrence

I would like to express my concern over the Martis Valley project. I live, work and own a home in Truckee. I feel this project will adversely affect the quality of my life.

The project in my opinion is too big. I don't want highway 267 to be a four lane highway. I also do not want the complexion of the small town I chose to live in to be changed forever.

191-1

I love Truckee because it is a small ideal place for me to raise my family. I enjoy the clean air, open spaces and relative lack of traffic. This project will have too much impact on all of these areas. Please consider reducing the size and magnitude of this project. The Lake Tahoe region is one of our nations finest places. Please think about this before allowing 7,000 new homes and new unnecessary golf courses to be built.

Thank you,


Kacey Brown

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 191: KACEY BROWN, RESIDENT

Response 191-1: Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration. The commentor is referred to Master Responses 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR) and 3.4.10 (Adequacy of the Traffic Impact Analysis).

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 192

Lori Lawrence
Placer County Planning Dept.
11414 B Avenue
Auburn, Ca 95603

Peter Kristian
12619 Rainbow Drive
Truckee, CA 96161

PLACER COUNTY
DATE
RECEIVED

AUG 19 2007

LL
PLANNING DEPARTMENT

Dear Ms. Lawrence

I am writing to express my opposition to the Martis Valley Community Plan. As a Truckee resident and homeowner I feel this project will only negatively affect the quality of life in this area.

I chose to live in Truckee, put down roots, and raise my family here in large part because of the beautiful natural environment and small size of the town and surrounding areas. I also work in Truckee off of highway 267 close to where this project will begin.

The impact of this large project on the Town of Truckee will be increased traffic, pollution and more residents to an area people live in for it's natural beauty and healthy environment. I don't want 7,000 new houses. I don't want highway 267 to be a 4 lane highway. This project is just too big.

Truckee is a special place for me. I live here because I think it is one of the most beautiful places in the country. Please do not allow development of the current proposed magnitude. The impact on this still small community is too great. Please take the citizens of Truckee into consideration when making decisions on this project. This project would change the environment that we live in forever.

Thank you,



Peter Kristian

192-1

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 192: **PETER KRISTIAN, RESIDENT**

Response 192-1: Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration. The commentor is referred to Master Responses 3.4.6 (Consideration of Impacts to the Tahoe Basin), 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR) and 3.4.10 (Adequacy of the Traffic Impact Analysis).

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 193

Date: July 12, 2002

Attn.: Lori Lawrence
Environmental Review Technician
Placer County Planning Dept.
11414 "B" Ave.
Auburn, Ca. 95603

PLACER COUNTY
DATE
RECEIVED

AUG 19 2002

PLANNING DEPARTMENT

Re: **Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050**

Dear Ms. Lawrence:

Thank you for the opportunity to comment on the above-referenced Plan Update and Draft Environmental Impact Report. Water quality is of interest to many people in this area, in part because of the problems with the Glenshire water supply containing high levels of arsenic. The Glenshire situation may be replicated in the Martis Valley, particularly because several test wells in the Martis Valley show unacceptable levels of arsenic, manganese and radon. Please do the necessary tests to confirm that the kind of water use predicted in the Proposed Plan will not result in elevated levels of arsenic, manganese, radon, and other hazardous elements in the ground water supply.

193-1

Substantial acreage (more than 4,000 acres) will be urbanized under the Proposed Plan. However, not all the sources of pollutants are identified. For example, the sediment load from ski runs and bike trails has not been analyzed. Moreover, construction sites frequently pollute waterways, yet no analysis has been done of

193-2

Re: **Draft Environmental Impact Report for the Proposed Martis Valley**

pg. _____

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

the specific kinds and levels of pollutants from construction activities. Please do an adequate analysis of the pollutants, such as sediments, oils, grease, trash, etc., which may arise from ongoing activities such as ski and bike trails and from construction sites. Without this information, it is not possible to meet the water quality objectives and load limitations for sediments which have been set for various water bodies and creeks in the Valley.

193-2
Cont'd

The DEIR relies on deferred policies and mitigations to conclude that the impacts from the Proposed Plan to water quality are less than significant. Unless the County requires specific measures to maintain or improve water quality, such as reducing the development footprint, eliminating golf courses, prohibiting massive amounts of grading, and determining how much true open space buffer is required to protect each water body in the plan area, it cannot logically conclude that the Proposed Plan will have insignificant impacts on water quality. Please include these measures in a revised DEIR to ensure our water quality.

193-3

Finally, although you assume there is some interaction between the upper aquifer, fed by surface waters, and the middle and lower aquifer, which will supply much of the water for the Proposed Plan, you conclude there is insufficient interaction between the two aquifers to permit contamination of ground water supplies by polluted surface water. Please quantify the amount of

193-4

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

pg. _____

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

interaction between the two aquifers so that the public is more certain that our ground water will not be contaminated by surface water.

193-4
Cont'd

In addition, because the DEIR is so long and complicated, I request that you extend the period for comments until the end of August, 2002. Furthermore, because of the inadequacy of the DEIR, I request that the DEIR be revised and recirculated.

193-5

Sincerely yours,

(Print Name)

(Print Address)

Gary Scott
PO Box 1345
Kings Beach, Ca.
96143-1345

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

pg. _____

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 193: **GARY SCOTT, RESIDENT**

Response 193-1: The commentor is referred to Response to Comment 189-1.

Response 193-2: The commentor is referred to Response to Comment 189-2.

Response 193-3: The commentor is referred to Response to Comment 189-3.

Response 193-4: The commentor is referred to Response to Comment 189-4.

Response 193-5: The commentor is referred to Response to Comment 189-5.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 194

Date: July 12, 2002

Attn.: Lori Lawrence
Environmental Review Technician
Placer County Planning Dept.
11414 "B" Ave.
Auburn, Ca. 95603

PLACER COUNTY
DATE
RECEIVED

AUG 19 2002

LL
PLANNING DEPARTMENT

Re: **Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050**

Dear Ms. Lawrence:

Thank you for the opportunity to
comment on the above-referenced Plan Update
and Draft Environmental Impact Report. I am
particularly interested in the Biological
Resources in the Martis Valley since I
frequently hike in the region.

As I reviewed the description of the
Martis Valley, I was surprised that no
attempt was made to describe the Placer Co.
Portion of the Valley as part of a larger
ecosystem, one that at least included the
watershed of the Truckee River as it flows
through the Valley. Your regional setting
description is simply one of the Sierra
Nevada mountain range. How is it possible to
assess whether proposed development would
have an impact on the vegetation and
wildlife of the Martis Valley if you analyze
the Placer County portion in isolation? For
example, how does the Martis Valley function
as a migration corridor between surrounding
areas for animals such as mule deer? What
width of migration corridor is required for
deer and other migratory species? Isn't
there a more precise method, such as radio

194-1

194-2

Re: **Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050**

pg. _____

collars on species of concern, rather than "road kill data", for determining migration corridors? Please describe the regional setting for the Martis Valley in a meaningful way.

194-2
Cont'd

In addition, please use adequate survey techniques to describe migration corridors as well as the presence or absence of animal and plant species of concern. This is especially important since Placer County is embarking on a Habitat Conservation Plan which would protect the diversity of life in this region. Since the studies for the Martis Valley have not been done, it is especially important that the information on biological resources for the Community Plan, which seeks to guide the development of the Valley for the next 20 years, be as detailed and accurate as possible. Unless the County develops more detailed information about species which currently depend on the Martis Valley, and their habitats, it is impossible to identify which land to develop and which land to preserve in order to assure continued survival of plants and animals of concern.

194-3

Since the Lahontan Cutthroat Trout is a federally threatened species, and since sediment and water quality can adversely affect spawning, I request that you analyze how new roads and roadway expansions, which require sanding in the winter, will affect recovery plans for this species. Similarly, the water requirements for recreational uses such as snow-making and golf courses and

194-4

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

pg. _____

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

their effects on water quality should be analyzed for their effects on the Lahontan Cutthroat Trout in particular, as well as other animal and plant species which might be affected.

194-4
Cont'd

The County relies on policies in the Community Plan to reduce potentially significant impacts on biological resources to less than significant. However, these policies are very vague and defer evaluation of many ecological resources such as wetlands, stream environment zones, habitat for rare, threatened or endangered animals and plants, deer ranges, large areas of non-fragmented natural habitat and wildlife movement zones, until specific development plans for projects are considered. This will be too late to limit development or change development patterns in the Martis Valley so that biological resources are protected. Such an evaluation should be made prior to submission of individual project proposals.

194-5

The logic of the plan is difficult to follow. Why, in the Draft Environmental Impact Report, does mitigation for the Proposed Land Use Diagram result in **less than significant impacts** for individual species of concern; yet, the cumulative impacts are **significant and unavoidable** ? Is this what happens when you look at projects or species in isolation, without considering the broader picture?

194-6

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 194: LORI ASHTON, RESIDENT

Response 194-1: The commentor is referred to Response to Comment 188-1.

Response 194-2: The commentor is referred to Response to Comment 188-2.

Response 194-3: The commentor is referred to Response to Comment 188-3.

Response 194-4: The commentor is referred to Response to Comment 188-4.

Response 194-5: The commentor is referred to Response to Comment 188-5.

Response 194-6: The commentor is referred to Response to Comment 188-6.

Response 194-7: The commentor is referred to Response to Comment 188-7.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 195

Date: July 12, 2002

Attn.: Lori Lawrence
Environmental Review Technician
Placer County Planning Dept.
11414 "B" Ave.
Auburn, Ca. 95603

PLACER COUNTY
DATE
RECEIVED

AUG 19 2002

PLANNING DEPARTMENT

Re: **Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050**

Dear Ms. Lawrence:

Thank you for the opportunity to
comment on the above-referenced Plan Update
and Draft Environmental Impact Report.
I am particularly concerned about long-term
water supply because water in the west is
relatively scarce. Let's be certain that
water in the Martis Valley is not wasted on
amenities such as private golf courses
unless there is sufficient water for all
other uses first.

195-1

The DEIR fails to prove that there is
sufficient water supply because it failed to
consider all planned land uses such as
landscaping and snow-making which would
generate demand for water. Please provide
detailed information about the water demands
of these and other potential uses.

195-2

Although the Proposed Plan assumes an
"adjusted holding capacity of only 9,220
units, the Community Plan would allow nearly
twice that number of units. Without
implementing a limit on the number of units,
it is wishful thinking to assume that the
number of units would be constructed at well
below the maximum densities permitted.

195-3

Re: **Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050**

pg. _____

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Because of this flaw in assumptions, the DEIR underestimates the amount of water required for housing development by as much as 50%. Moreover, it assumes that only 20 % of the homes will be permanently occupied. However, that ignores the fact that many of the homes will have fractional ownership or be part of a rental program. Once again, this results in an underestimation of water demand.

195-3
Cont'd

Recent newspaper accounts of the effect of global warming (now widely believed by both the federal government and scientists to be real) on the western states indicate that snow pack in the Sierras will be greatly reduced in as few as 30 years. Since most of the water for this region is a result of snowfall, water should be conserved, not wasted on private golf courses which will serve only a small percentage of the local population. I urge the county to take a long-term view toward land and water use rather than one based on short-term economic windfalls for developers.

195-4

Some current development in the Martis Valley, such as Northstar, depends on spring water. No analysis has been done on the effect of using this water on wetlands in the area. It is not adequate to assume that there is not much interaction between springs, seeps and other types of surface water with the deeper ground water which will supply water to much of the proposed development. Please do the type of analysis

195-5

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

required to prove the lack of interaction between surface and ground water which you assume in the Draft Environmental Impact Report. Also evaluate the use of spring water by development, both proposed and current, on regional wetlands.

195-5
Cont'd

New infrastructure will have to be developed to provide proposed development with water. Yet no analysis has been done to evaluate the effects of water storage units, pipes, and wells on the surrounding development. Please do the necessary studies.

195-6

It is imperative that the County demonstrate the availability of adequate water prior to allowing such intensive, water-demanding development in the Martis Valley in order to evaluate the impacts of new development on the water supply. It is not sufficient to defer the demonstration of long-term, reliable and adequate supplies of potable water to proponents of new development (Policy 6.C.1)

195-7

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

pg. _____

***Martis Valley Community Plan Update
Final Environmental Impact Report***

*Placer County
May 2003*

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 195: DIANA L. COMOUCHE, RESIDENT

- Response 195-1:* The commentor is referred to Master Response 3.4.4 (Water Supply Effects of the Project) and Section 4.7 (Hydrology and Water Quality) of the Draft EIR.
- Response 195-2:* The commentor is referred to Response to Comment 195-1 and Table 4.7-4 on Page 4.7-55 in Section 4.7 (Hydrology and Water Quality) of the Draft EIR regarding concerns relating to water supply for landscaping and snowmaking.
- Response 195-3:* The commentor is referred to Master Responses 3.4.2 (Assumptions Used for Development Conditions in the Plan Area) and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR) regarding buildout potential and adjusted holding capacity.
- Response 195-4:* The commentor is referred to Master Response 3.4.4 (Water Supply Effects of the Project) for a discussion regarding global warming and water supply.
- Response 195-5:* The commentor is referred to Response to Comment 195-1.
- Response 195-6:* The commentor is referred to Master Response 3.4.4 (Water Supply Effects of the Project) and Section 4.11 (Public Services and Utilities) of the Draft EIR.
- Response 195-7:* The commentor is referred to Response to Comment 195-1.
- Response 195-8:* The commentor is referred to Master Response 3.4.9 (Adequacy of the Review Period). The commentor also requests that the County prepare a revised Draft EIR and recirculate it to the public. The County considers the Draft EIR and Revised Draft EIR adequate for consideration of the project and consistent with the requirements of CEQA.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 196

Date: July 12, 2002

Attn.: Lori Lawrence
Environmental Review Technician
Placer County Planning Dept.
11414 "B" Ave.
Auburn, Ca. 95603

PLACER COUNTY
DATE
RECEIVED

AUG 19 2002

PLANNING DEPARTMENT

Re: **Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050**

Dear Ms. Lawrence:

Thank you for the opportunity to
comment on the above-referenced Plan Update
and Draft Environmental Impact Report.
Although the Proposed Plan states that the
Placer County portion of the Martis Valley
has an adjusted holding capacity of 9,220
units, certain aspects of the plan may well
induce growth far beyond this number.

196-1

Most of the units in the Proposed Plan
are luxurious second homes or resort
accommodations. This type of development
requires a large service industry which
employs people who cannot usually afford
market-priced housing in this area.
Developers are required to provide a maximum
of only 50% of their employee's housing.
Therefore, many employees must often commute
long distances. However, there is no
analysis of the degradation of traffic or
air quality if employees must commute from
cities such as Reno or Auburn. Nor is there
even an estimate of the number of local
employees who already make similar commutes.
Likewise, there is no analysis of the
infrastructure demands for employees who may

196-2

Re: **Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050**

pg. 1

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

live in to-be-constructed employee housing, for example at the proposed Northstar Employee Housing project. Similarly, the County does not calculate the housing demands for construction workers employed in the development of the Proposed Plan. These impacts are potentially significant and should be evaluated as to how they will further degrade traffic service, air quality and habitat and place increased demand on public services.

196-2
Cont'd

The Proposed Plan does not place limits on growth. Additional roads and infrastructure such as new wells and water storage units may well induce additional growth beyond the 9,220 units. Moreover, the County has already rezoned property from "forest" to "residential" for employee housing at Northstar. These are growth inducing impacts and must be analyzed.

196-3

196-4

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

pg. 2

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

In addition, because the DEIR is so long and complicated, I request that you extend the period for comments until the end of August, 2002. Furthermore, because of the inadequacy of the DEIR, I request that the DEIR be revised and recirculated.

196-5

Sincerely yours,



(Print Name)

MARYA RODDIS

(Print Address)

POB # 1471

K.B, CA. 96143.

Thank you
for your time & concern

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

pg. 3

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 196: MARYA RODDIS, RESIDENT

Response 196-1: The commentor is referred to Response to Comment 185-1.

Response 196-2: The commentor is referred to Response to Comment 185-2.

Response 196-3: The commentor is referred to Response to Comment 185-3.

Response 196-4: The commentor is referred to Response to Comment 185-4.

Response 196-5: The commentor is referred to Response to Comment 185-5.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 197

15 August 2002

Attn: Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 "B" Avenue
Auburn, CA 95603

PLACER COUNTY
DATE
RECEIVED
AUG 19 2002
PLANNING DEPARTMENT

Re: Draft Environmental Impact Report for the Proposed Martis Valley Community Plan
Update, SCH No. 2001072050

Dear Ms. Lawrence;

Thank you for the opportunity to comment on the above referenced Plan Update and DEIR. There are so many issues I would like to address that I don't have time or space to fit them all in. I am sure that my objections to the Plan and EIR have mostly been addressed by others who feel this project is irresponsible and should be halted and rethought.

197-1

I would like to specifically address the issue of mitigation. I see no logical progression from significant impact to no impact with mitigation. For instance, air quality is mitigated by off-site remedies or an in lieu fee. How is this going to protect air quality in the Martis Valley? Simple logic tells us the air in Martis will still suffer the consequences of your development.

197-2

Golf courses as wildlife corridors are patently absurd. Are the animals only supposed to use this when the golf courses are closed? I don't believe the critters will move in these corridors with people around and even if they did the golfers would have them shot. Check out Hilton Head Island, SC, they have a huge problem with alligators on their courses.

197-3

You provide affordable housing for half the employees generated by this project. Where are the other half going to live? We already have a huge affordable housing deficit. Does this 50% include construction workers? Where will they live?

197-4

How can all this construction be completed with only a two-lane highway to move construction vehicles on and off-site? Your representatives have stated that the four-lane highway will come into existence only after the project is mostly completed. On the subject of traffic, I and numerous other members of the public have shown up at public meetings to tell your planners that we don't care what the traffic models show. I believe your models are wrong. I have lived here 16 years and theory and quantitative analyses are just that. How can you prove these theories apply to our situation?

197-5

CEQA and NEPA require a "no build" alternative. How do you justify reverting to the old plan in this case? This is certainly contrary to the spirit and intent of CEQA if not the law.

197-6

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

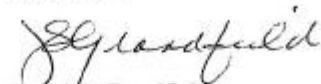
Opportunities for citizen input have so far been absolutely appalling. First, most of the locals around here still do not know about the proposed plans for Martis Valley. Second, your announcements for public meetings are woefully inadequate and/or non-existent. A typical newspaper announcement usually reads "Martis Valley Meeting at 8:30 am today! Or, the various meetings are scheduled during working hours. Is this done intentionally to preclude citizen input? Furthermore, I am deeply offended by Mr. Yeager titling a list of complaints from local environmentalist as "Myths and Misconceptions". Most of our numbers who oppose this development are probably more educated than some of your associates. I personally have a BS in Biology and an MA in Environmental Policy. These are certainly not myths or misconceptions and for you to treat them as such is contrary to your claim that you solicit and welcome public comment. For the most part your treatment of the public at these meetings is dismissive and impertinent. We are not stupid and don't appreciate being treated that way.

197-7

Summarily, your DEIR is laughable. Did you really thing you could fend us off with platitudes, lame excuses, and BS? For the various reasons listed above I believe the public has not been adequately informed of the planned development much less had adequate time to comment. I believe you should at the very least extend the DEIR comment period to allow the maximum 90-day comment period. I further believe this proposed development would benefit only the rich while creating a serious cost to the local, voting, tax paying public while irrevocably damaging our environment. Can you please explain and justify this blatant "gentrification"? Do you realize that when the last person buys the last "cabin in the woods" then none of us have our cabin in the woods?!?!?

197-8

Thank You,



Jacqui S. Grandfield
P.O. Box 1281
Kings Beach, CA 96143

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 197: JACQUI S. GRANDFIELD, RESIDENT

Response 197-1: Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.

Response 197-2: The commentor is referred to Master Responses 3.4.6 (Consideration of Impacts to the Tahoe Basin) and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR), as well as Section 4.6 (Air Quality) of the Draft EIR. Mitigation measures contained in the Draft EIR, in combination with County policies and implementation programs, can feasibly reduce impacts to a “less than significant” level. Regarding air pollution, the policies and mitigation measures introduced by the Plan and EIR require construction to “fully mitigate their construction air pollutant emissions that are in excess of PCAPCD thresholds.” Mitigation measure MM 4.6.1 will reduce impacts to air quality by paving dirt roads within the Martis Valley Planning Area, thereby decreasing a source of PM10 (particulate matter) within the air basin to offset construction impacts. Thus off-site mitigation means off the specific construction site but within the Martis Valley air basin. There should be no net gain in PM10 with this mitigation measure.

Response 197-3: Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration. Regarding the consideration of golf courses as open space, the Placer County General Plan allows recreational uses in their Open Space Land Designation and does not differentiate between public and private. The commentor does not comment on the adequacy of the EIR; therefore, no further response is necessary.

Response 197-4: The commentor is referred to Response to Comment 5-1.

Response 197-5: The commentor is referred to Master Responses 3.4.10 (Adequacy of the Traffic Impact Analysis) and Section 4.4 (Transportation and Circulation) of the Draft EIR. The commentor’s opinion regarding the traffic model is noted. The commentor is referred to Page 3.0-21 in Section 3.0 (Project Description) of the Draft EIR, which includes an extensive discussion of data and methodologies used in modeling the traffic effects of the project. The commentor provides no evidence countering the conclusions of the traffic analysis provided in the Draft EIR. Therefore, no further response is necessary.

Response 197-6: The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis). CEQA does not require a “no build” alternative (per CEQA Guidelines 15126.6). A “no build” alternative does not apply to a project that is a land use or regulatory plan. Consistent with CEQA, the Martis Valley Community Plan Update Draft EIR includes a “no project” option, which results in a default to the former old plan. This is based on CEQA Guidelines 15126.6 (Consideration and Discussion of Alternatives to the Proposed Project) Section (e)(3)(A), “When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

"no project" alternative will be the continuation of the existing plan, policy or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan." Furthermore, according to Section (e)(2) (2), *"The "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."* The Placer County General Plan provides for a certain level of development and the Community Plan creates a structure with policies and mitigation measures to guide growth. Additionally, the project does not involve a federal action. Therefore, the project is not subject to NEPA.

Response 197-7: Comment noted. The comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.

Response 197-8: Comment noted. The commentor is opposed to the Martis Valley Community Plan and Draft EIR. The commentor states that the Draft EIR is laughable and fails to adequately inform the public of planned development. However, the commentor fails to identify the inadequacy of the Draft EIR. CEQA does not evaluate socioeconomic impacts of a project or "gentrification." Regarding the comment period, the commentor is referred to Master Response 3.4.9 (Adequacy of the Review Period). The commentor also requests that the County prepare a revised Draft EIR and recirculate it to the public. The County considers the Draft EIR and Revised Draft EIR adequate for consideration of the project and consistent with the requirements of CEQA.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 198

Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 "B" Ave.
Auburn, CA 95603

PLACER COUNTY
DATE
RECEIVED

AUG 19 2002

LL

PLANNING DEPARTMENT

Re: Draft EIR for the proposed Martis Valley Plan Update, SCH # 2001072050

Dear Ms Lawrence:

We are very concerned about the proposed plans for the Martis Valley. The DEIR currently up for review offers only alternatives for significant development of the valley. It does not give us ANY alternatives for minimal development, or no development at all.


198-1

Increased population in Truckee is making it more city-like every year. While the 267 bypass will provide us some relief from the severe traffic congestion we currently experience, thousands of new homes in the Martis Valley will more than offset any improvement.

198-2

In the last 20 years the scenic beauty of the valley has been compromised by repeated development. However, what remains of the open space is still very beautiful. (If you have never driven 267 from Northstar towards Truckee at sunset, you owe it to yourselves to do so before you make any decisions regarding this area.) The reason people want to live here is because it is a beautiful place, and accelerating development is destroying that very quality.

198-3

Sincerely,

Martin Meyers
Barbara Sutherland
PO Box 3975
Truckee, CA 96160

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 198: MARTIN MEYERS, RESIDENT

Response 198-1: The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis) and Section 6.0 (Project Alternatives) of the Draft EIR.

Response 198-2: The commentor is referred to Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis).

Response 198-3: Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 199

17 August 2002

Dear Ms. Lawrence,

199-1 I urge you to reject the proposed development of Martin Valley on the grounds that doing so would destroy the beautiful, yet complex environment we all have come to know and love.

I also strongly urge you to reject the expansion of Highway 267.

Respectfully,

Christine Thoma

2808 Clay Street
San Francisco, CA
94115

415. 440. 2808

PLACER COUNTY
DATE
RECEIVED

AUG 19 2002
PLANNING DEPARTMENT

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 199: **CHRISTINE THOMA, RESIDENT**

Response 199-1: Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 200

QUINTANA CONSTRUCTION
P.O. Box 217
Tahoe Vista, California 96148
(530) 587-4431

PLACER COUNTY
DATE
RECEIVED

AUG 19 2002

PLANNING DEPARTMENT

August 15, 2002

Ms. Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 "B" Avenue
Auburn, California 95603

Re: Environmental Draft report No. SCH No. 2001072050
For Proposed Martis Valley Community

Dear Ms. Lawrence:

We should learn from our past record. In 1968 the NTPUD which served the area from National Avenue to the Nevada State line spilled one million plus gallons of untreated sewer into the water of Lake Tahoe for a period of two years. The spill exceeded one million gallons a day because Kings Beach was also spilling across the highway at various locations.

The State of California issued a mandate for the District to build an export system and remove the sewage from the waters of Lake Tahoe ASAP. I was elected president of the NTPUD Board and was to do what was necessary to build the export system.

The spill continued for a period of two years before we could send our sewage into the NTPUD lines and thereby avoiding any more spills into Lake Tahoe.

The TTSA plant was not completed until 1978.

The Truckee River is an interstate river, therefore the TTSA plant cannot send treated water into the river unless it meets requirements for an interstate river. Lawsuits have been filed by the City of Reno and the Indians because the TTSA plans was discharging treated water into the Truckee River that did not meet specifications.

I understand that the lawsuits have been settled and the TTSA Plant is now discharging acceptable water into the Truckee River. In order for additional development to take place not only in the Lahontan project but other large projects without assurance

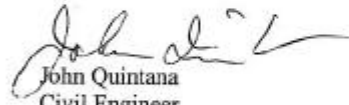
200-1

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

by the TTSA Board of Directors that sewer service will be available to them in the near future is very simply a disaster waiting to happen.

Perhaps logic will not allow the politicians to overload the TTSA plant.

Very truly yours,



John Quintana
Civil Engineer
Bachelor of Science
Class of 1956 University of Nevada

200-1
Cont'd

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 200: **JOHN QUINTANA, QUINTANA CONSTRUCTION**

Response 200-1: Comment noted. The commentor is referred to Master Response 3.4.3 (Water Quality) and Section 4.11 (Public Services and Utilities) of the Draft EIR. As discussed in the first paragraph on pages 4.11-56 through -62 in Section 4.11, the expanded WRP with a capacity of 9.6 mgd would adequately accommodate buildout of the Plan area under the Proposed Land Use Diagram and the other three alternatives. The expansion of the WRP is scheduled for 2005 and the Lahontan Regional Water Quality Control Board recently approved discharges permits for the expansion.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 201

August 17
Date: July 12, 2002

Attn.: Lori Lawrence
Environmental Review Technician
Placer County Planning Dept.
11414 "B" Ave.
Auburn, Ca. 95603

PLACER COUNTY
DATE
RECEIVED
AUG 19 2002
LL
PLANNING DEPARTMENT

Re: **Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050**

Dear Ms. Lawrence:

Thank you for the opportunity to comment on the above-referenced Plan Update and Draft Environmental Impact Report.

I am particularly concerned about long-term water supply because water in the west is relatively scarce. Let's be certain that water in the Martis Valley is not wasted on amenities such as private golf courses unless there is sufficient water for all other uses first.

201-1

The DEIR fails to prove that there is sufficient water supply because it failed to consider all planned land uses such as landscaping and snow-making which would generate demand for water. Please provide detailed information about the water demands of these and other potential uses.

Although the Proposed Plan assumes an "adjusted holding capacity of only 9,220 units, the Community Plan would allow nearly twice that number of units. Without implementing a limit on the number of units, it is wishful thinking to assume that the number of units would be constructed at well below the maximum densities permitted. Because of this flaw in assumptions, the DEIR underestimates the amount of water required for housing development by as much as 50%. Moreover, it assumes that only 20 % of the homes will be permanently occupied. However, that ignores the fact that many of the homes will have fractional ownership or be part of a rental program. Once again, this results in an underestimation of water demand.

201-2

Recent newspaper accounts of the effect of global warming (now widely believed by both the federal government and scientists to be real) on the western states indicate that snow pack in the Sierras will be greatly reduced in as few as 30 years. Since most of

201-3

Re: **Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050**

pg. 1

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

the water for this region is a result of snowfall, water should be conserved, not wasted on private golf courses which will serve only a small percentage of the local population. I urge the county to take a long-term view toward land and water use rather than one based on short-term economic windfalls for developers.

201-3
Cont'd

Some current development in the Martis Valley, such as Northstar, depends on spring water. No analysis has been done on the effect of using this water on wetlands in the area. It is not adequate to assume that there is not much interaction between springs, seeps and other types of surface water with the deeper ground water which will supply water to much of the proposed development. Please do the type of analysis required to prove the lack of interaction between surface and ground water which you assume in the Draft Environmental Impact Report. Also evaluate the use of spring water by development, both proposed and current, on regional wetlands.

201-4

New infrastructure will have to be developed to provide proposed development with water. Yet no analysis has been done to evaluate the effects of water storage units, pipes, and wells on the surrounding development. Please do the necessary studies.

201-5

It is imperative that the County demonstrate the availability of adequate water prior to allowing such intensive, water-demanding development in the Martis Valley in order to evaluate the impacts of new development on the water supply. It is not sufficient to defer the demonstration of long-term, reliable and adequate supplies of potable water to proponents of new development (Policy 6.C.1).

201-6

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

pg. 2

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

In addition, because the DEIR is so long and complicated, I request that you extend the period for comments until the end of August, 2002. Furthermore, because of the inadequacy of the DEIR, I request that the DEIR be revised and recirculated.

201-7

Sincerely yours,

Connie Philipp

(Print Name)

Connie Philipp

(Print Address)

50 Windsor Ave

Kensington, CA 94708

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

pg. 3

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 201: CONNIE PHILIPP, RESIDENT

Response 201-1: The commentor is referred to Response to Comment 195-1.

Response 201-2: The commentor is referred to Response to Comment 195-2.

Response 201-3: The commentor is referred to Response to Comment 195-3.

Response 201-4: The commentor is referred to Response to Comment 195-4.

Response 201-5: The commentor is referred to Response to Comment 195-5.

Response 201-6: The commentor is referred to Response to Comment 195-6.

Response 201-7: The commentor is referred to Response to Comment 195-7.

Letter 202

PLACER COUNTY
DATE
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AUG 19 2002

PLANNING DEPARTMENT

Aug. 15, 02
Rebecca Morales
Box 481
Tahoe Vista,
Ca. 96148

Attention Lou Lawrence,

I am writing this letter with great concern with excess building in the Placer County, Tahoe area. I've been a 25 yr. resident and tax payer year round in this area. During those years I've witnessed over population increases, which have brought with it; yearly summer extreme pre-dangers, polluted waters, to the degree of mandatory bottle water usage in Donner Lake area and Alexshire, and very poor air quality; especially in Martis Valley. Along with these, we now have uncontrollable traffic congestions on account of our very limited roadway in/out of the Basin, which throughout the warmer months are always under construction; only adding to this problem.

On the late 70's early 80's it was close to impossible to build in this area. However,

202-1

202-1
Cont'd

Cabins were constructed. Today, money talks and building is rampant. Second homes are 3,000 sq. ft. + using excess power and water. New constructions are vegetated with lawns and other growths not native to this area.

Today's growth is frightening and breathes devastation in the future.

My question is... What can be done to reverse, slow or stop this life threatening growth? Has the care and concern for humanity and wildlife been lost in money and greed?

I have worked for Shingway throughout the North Shore close to 25 years. In the past, landing a job with this Co. was an achievement. Now, our summer help is imported from what use to be Eastern Block Countries such as, Czech Republic, Poland and Romania. These employees are paid \$10.50.

202-1
Cont'd

Cash and their housing is subsidized. How can this possibly benefit our area and/or our country? In the winter months North Star Ski area hires mostly from Australia, Squaw Valley imports from South Africa, yet our unemployment rates increase.

Please help me to understand these growing problems. I am very distraught and concerned on all issues

Sincerely,
Rebecca Maglin

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 202: **REBECCA MAGALI, RESIDENT**

Response 202-1: Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration. The commentor is referred to Master Responses 3.4.2 (Assumptions Used for Development Conditions in the Plan Area), 3.4.6 (Consideration of Impacts to the Tahoe Basin), 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR), 3.4.8 (Affordable and Employee Housing Effects of the Project), and 3.4.10 (Adequacy of the Traffic Impact Analysis). The commentor's concerns regarding growth and summer employment are socioeconomic issues, which are not within the scope of the Draft EIR.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 203

August 14, 2002

Ms. Lori Lawrence
Environmental Review Technician
Placer County Planning Dept.
11414 "B" Avenue
Auburn, CA 95603



Dear Ms. Lawrence:

Our family owns a home in the Martis Valley, specifically in Lahontan. We purchased the land our home is on in 1998 and finished construction of our home in 2001. We were attracted to the Martis Valley area for its year-round recreational opportunities, for its scenic beauty, for its clean air and uncrowded living conditions. We pay taxes on our property and support the local economy. We regularly invite friends and family to stay with us at our home. These people also appreciate the wonderful Tahoe surroundings and the natural beauty of the area.

We recognize that we benefit from the residential development that has been permitted to this date. Lahontan would not exist without strong community support and government approvals. We realize that our resistance to further development can appear hypocritical. Nonetheless, we are shocked at the minimal level of planning that has been performed to date on the future development of the Martis Valley. The scope of the future development is enormous in relation to current development. If the current plan is allowed to proceed, then the Martis Valley will soon become a smog-filled, traffic-congested urban sprawl...not at all the world-class nature area that it is today.

203-1

In particular, the EIR fails to adequately analyze the full impact of the totality of the development projects. Since we live off Schaffer Mill Rd. we are particularly concerned that not one, not two, but three residential projects are in the works for this road alone. What is currently a quiet, open road leading to Lahontan will, under this scenario, become a highly traveled conduit. It seems likely that Rt. 267 will either become equally congested or need to be expanded to a four lane superhighway. Air pollution, noise pollution, water pollution, roadside litter and the further displacement of wildlife are sure to result.

203-2

We regularly see coyotes and bears near our house. Marmots, squirrels, fish, hawks and other wildlife are abundant. It is hard to see how these species will survive under the onslaught of development that is possible under the current plan. This plan does not adequately address how the effects of development will be mitigated and intelligently managed.

203-3

We as a community in Martis Valley get only one chance to do the right thing. If we blow it now, then the generations that follow us will look back in anger and disappointment at how we squandered this amazing natural resource. Put in more effort now so that none of us regrets our future actions. My wife recently read a book entitled The Tipping Point by Malcolm Gladwell. This book describes the tipping point as "that magic moment when an idea, trend, or social behavior crosses a threshold, tips and spreads like wildfire." As it relates to the Martis Valley, the tipping point comes when a number of smaller decisions cumulate and cascade into a full-blown, uncontrollable development disaster.

203-4

Please do more analysis. Proceed cautiously. Don't ruin a national treasure.

Sincerely,

A handwritten signature in cursive script that reads "Adam Cloth".

Adam Cloth
12216 Pete Alverson Rd.
Truckee, CA 96161

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 203: **ADAM CIOTH, RESIDENT**

- Response 203-1:* The commentor is referred to Master Responses 3.4.2 (Assumptions Used for Development Conditions in the Plan Area), 3.4.6 (Consideration of Impacts to the Tahoe Basin), 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR).
- Response 203-2:* The commentor is referred to Response to Comment 203-1 and Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis).
- Response 203-3:* The commentor is referred to Master Response 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR) and Section 4.9 (Biological Resources) of the Draft EIR.
- Response 203-4:* Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 204

Donald R. Cooper, DDS
855 Beaver Pond
Truckee, CA 96161

August 13, 2002

PLACER COUNTY
DATE
RECEIVED
AUG 19 2002
PLANNING DEPARTMENT

Attn: Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 "B" Avenue
Auburn, CA 95603

Re: DEIR for Proposed Martis Valley Community Plan Update

Dear Ms. Lawrence:

From the perspective of a citizen who has given the majority of his life to serving the health needs of his community, I am writing to declare my concerns about one aspect of the Martis Valley Community Plan Draft Environmental Impact Report.

The health care delivery system of the Martis Valley, and indeed of surrounding communities such as Kings Beach and other nearby North Lake Tahoe communities, is presently heavily stressed. Utilization rates are extremely high, and facility usage and availability of health care professionals are almost totally maxed out.

The new Draft EIR utterly fails to address the impact on health care which will result from the extensive expansion of development contemplated by the Plan. The Plan does not look at the needed increase in population of doctors, dentists, nurses, dental assistants, X-ray technicians, medical laboratory technicians, and all other health care support personnel. Nor does it indicate where these people will live, nor the additional community infrastructure (hospitals, medical/dental offices, markets, shops, drug stores, parks, restaurants, etc.) which they alone will require in *addition* to the contemplated permitted growth. Most disturbing is the absence of thought as to the impact on the health care delivery system of neighboring Truckee.

I fail to see that the Draft EIR properly examines these issues, and am expressing my dissatisfaction with this element of the document. I ask that the DEIR go back to the study process, and that a realistic in-depth study of the present and future total health care needs of all of Martis Valley and surrounding communities be included in a new DEIR.

Sincerely,


Donald R. Cooper, D.D.S.

204-1

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 204: **DONALD R. COOPER, D.D.S.**

Response 204-1: The commentor is referred to Master Response 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR). Emergency services are covered in Section 4.11 (Public Services and Utilities) of the Draft EIR. In regards to hospital and medical infrastructure, this is not an environmental issue that is evaluated under CEQA. However, Dave Bottenmiller, Chief Financial Officer of the Tahoe Forest Hospital, was contacted to determine potential impacts associated with implementation of the Martis Valley Community Plan. The Tahoe Forest Hospital is planning and constructing expansions that will meet existing and future demands, which includes the population increase associated with the Plan area. The hospital does not foresee any service issues associated with implementation of the Martis Valley Community Plan. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 205

Donald R. Cooper, D.D.S.
855 Beaver Pond
Truckee, CA 96161

August 14, 2002

PLACER COUNTY
DATE
RECEIVED
AUG 19 2002
LL
PLANNING DEPARTMENT

Attn: Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 "B" Avenue
Auburn, CA 95603

RE: DEIR for Proposed Martis Valley Community Plan Update

Dear Ms. Lawrence:

I attended many of the Update Meetings, as a citizen interested in the future of this beautiful and special place. When the DEIR finally was produced, I was truly amazed to see how the majority of ordinary citizen input was ignored, and rampant development plans were being endorsed, it seemed *carte blanche*.

As a citizen attendee of these meetings, I fully expected to see a recognition that society has learned a few lessons about the need to protect the Environment during the 30 years since the land use designations were made for this area. Some of the lessons learned by California citizens are contained in the California Environmental Quality Act. It would appear that this DEIR would ignore many of the provisions of CEQA.

205-1

The land use designations now being proposed in the Plan are no more enlightened than those adopted three decades ago. The old use designations do not have any analysis to support their creation because they pre-dated CEQA. And yet, incredibly, this Plan – *30 years later* – is based on those same old assumptions. What happened to progress?

Another concern I have is with the Plan's failure to deal specifically with both the workforce housing, and affordable housing. Where will the construction workers live? What are the traffic impacts of workers going to and from work? How about the ordinary folks, who bake our bread, staff the variety stores, sell us our groceries – they can't afford to live here now; where are they supposed to live? In this Plan, I can find no proper assessment of what conditions exist now; so how can predictions which appear "out of the blue" in the Plan accurately reflect the true impact of the future?

205-2

This Plan needs a LOT more homework.

Sincerely,


Donald R. Cooper, D.D.S.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 205: DONALD R. COOPER, D.D.S.

Response 205-1: Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration. The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis). The commentor states that the Draft EIR ignored many of the provisions of CEQA, but the commentor fails to identify the inadequacy of the Draft EIR. The Draft EIR provides an extensive analysis of project impacts in compliance with CEQA.

Response 205-2: The commentor is referred to Master Response 3.4.8 (Affordable and Employee Housing Effects of the Project). This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 206

Attn: Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 "B" Avenue
Auburn, CA 95603

PLACER COUNTY
DATE
RECEIVED
AUG 19 2002
PLANNING DEPARTMENT

RE: Draft Environmental Impact Report for the Proposed Martis Valley Community Plan update, SCH
No: 2001072050

Dear Ms. Lawrence:

Thank you for the opportunity to comment on this draft environmental impact report. First, I have three requests: 1) As the DEIR is a very complicated document, and it is very time intensive to review environmental impacts and correlate them to appropriate Placer county policies, goals, and mitigation measures, I request an extension of the public comment period, 2) By my examination thus far, it is evident that this DEIR neither follows the letter of or the intent of the California Environmental Quality Act, and I therefore request that a revised DEIR that meets CEQA requirements be completed and recalculated for public review, 3) One of the glaring faults of the DEIR is that there was virtually no public input for this plan. There was no representation for the environmental community, the affordable housing community, TRPA, the Lake Tahoe Community, Nevada County, the Town of Truckee, diversification of the economy proponents, and sustainable economic experts. All of these citizens have a stake and a voice in the future of their community, and none were effectively represented. I therefore request that the present planning process be stopped and a new state of the art Smart Growth Citizens committee be formed that will do a true community visioning process that looks at all the interest of this diverse community.

206-1

A detailed review of the DEIR shows that the groundwater quality in the Martis Valley area is not adequately studied. "The GeoTrans report points out that arsenic, manganese, and radon concentration in the local ground water are a water quality concern in the Martis Valley." (DEIR 4.7-15). Please review all current data that shows which wells have an arsenic (greater than 0.005 mg/l), manganese (greater than 0.05 mg/l), and radon (greater than 300 pico curies/l) level, all of which are considered to be unhealthy by the Environmental Protection Agency.

206-2

The entire neighborhood of Glenshire in the town of Truckee recently switched their water system to the TDPUD because of contamination. The DEIR details several wells in the plan area that are contaminated with arsenic, manganese, and radon. It is illogical and bad science for Nimbus to repeatedly assume that 24,700 acre feet of water is available for drinking water without taking into consideration whether all of that water is fit for human consumption. Please drill wells at all areas that are expected to be drilled at build-out for the proposed plan and test for the above levels of arsenic, manganese, and radon, then subtract the amount of water available from contaminated wells. If this is not possible, drill enough wells so that there is a statistically significant portion of the aquifer studied. Apply the appropriate level of contamination to the whole aquifer (with a realistic margin of error), and then report the availability of water after detailing the levels of contamination. Without this detail, it is impossible to determine the availability of clean drinking water available to the citizens of the plan area.

The executive summary of the Nimbus study (page 1 underline added for emphasis) states, "The water balance is an appropriate tool for identifying and predicting the movement of ground water in the Martis Valley Ground Water Basin under equilibrium conditions. Water balance methods have been widely utilized to estimate available groundwater in a variety of hydrogeologic environments. The water balance represents conditions of long term average precipitation and best estimates of current ground water

206-3

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

inflows and outflows... Approximately 24,700 acre-feet of ground water is available.... This value is based on the best available data and methods of analysis appropriate to the quantity and quality of these data. This evaluation is of a degree of accuracy and certainty consistent with the established practices of geologic and hydrologic analysis and judgment. Ground water in storage is estimated to be 484,000 acre feet."

When an engineer or scientist uses words like predicting, estimates, approximately, appropriate to the quantity and quality, and judgement, the reader knows that the data is worthless without a stated margin of error. Nowhere in the DEIR is it mentioned that there is a very large margin of error in the calculated amount of water available from the Martis Valley Aquifer. Please detail the margin of error in all the data used for the aquifer study including but not limited to recharge efficiency (table 1), ground water recharge (table 2), recharge due to precipitation (table 3), groundwater extraction (table 4), septic system estimates (table 5), irrigation consumptive use and recharge (table 6), summary of ground water recharge, movement, and discharge (table 7), average annual water balance (table 8), USGS stream flow gaging station data (table 9), Truckee river and Carson river regression results (table 10), results of mass balance (table 11), and Calculation of Available Ground Water (table 12), and then apply this margin of error to the data in the DEIR. Please detail the margin of error and report it every time the amount of available ground water is mentioned in the DEIR.

206-3
Cont'd

Also, and again, when a scientist states that the number is the best available according to the "quantity and quality" of the data available, it is obvious that data is either missing or of questionable quality. Please detail the type of studies that would substantially increase the quality and quantity of the data used to calculate the amount of water available in an aquifer study. Please report the time frame needed, the types of data that would increase the quality of the final analysis, the resulting margin of error for a study with higher quality data, and the reason why this type of study was never undertaken.

In light of the overall quantity and quality of the data, and a call to Nimbus confirmed that the margin of error on a water balance study can easily approach or exceed 50%, lets review the availability of ground water in the Martis Valley Aquifer. With water quality problems for arsenic, manganese, and radon, predict that 10% of the available water is contaminated and not suitable for human consumption, and the study really has a margin of error of 50%. With these valid assumptions, the amount of water available and reported in the DEIR should be reported as 22,000 acre feet plus/minus 11,000 acre feet. Therefore, the amount of available water could be as low as 11,000 acre feet.

From the DEIR (page 4.7-55), "In addition to the build out under the Proposed Land Use Diagram, the remaining portions of the Martis Valley (Town of Truckee, Nevada County) are expected to generate a water demand of approximately 13,000 to 14,000 acre-feet annually (Antonucci, 2001). Thus, the total water demand for the Martis Valley (both Placer and Nevada County) at build-out is anticipated to be 21,000 to 22,000 acre-feet annually."

The amount of available water is very possibly as low as 11,000 acre-feet. The proposed plan uses water well over the rate that is acceptable. There is a definite and calculatable risk that the projected use for water for the area studied is 100% more than available. Please use better data and then perform the statistical analysis that will tell the community what the probability is that the amount of available water will be exceeded. If only 11,000 acre-feet is available, and a long term draw down of our aquifer occurs, the results could be disastrous. The ski and golf industries will not have enough water to function at build out, our tourist based economy will literally dry up, wells will get deeper and deeper, more electricity will be used to pump, wetlands and wildlife habitat will be destroyed, and the local residents will not have sufficient drinking water.

206-4

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

The DEIR is insufficient in the quality of the water analysis because the data is of inadequate quality. Please collect quality long term gauged data and do a quality water analysis, and then report that data with appropriate margins of error in a revised DEIR.

206-5

Also, please develop an alternative plan in conjunction with the town of Truckee and Nevada county that allows for development that does not exceed water use of 9,000 acre feet. This plan should then be reported in and evaluated in the DEIR.

206-6

Sincerely,


Tom Ameika
Tahoe Group of the Sierra Club

TJ Ameika
PO Box 6512
Incline Village, NV
89450

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 206: TOM AMEIKA, TAHOE GROUP OF THE SIERRA CLUB

- Response 206-1:* Regarding the comment period, the commentor is referred to Master Response 3.4.9 (Adequacy of the Review Period). The commentor also requests that the County prepare a revised Draft EIR and recirculate it to the public. The County considers the Draft EIR adequate for consideration of the project and consistent with the requirements of CEQA. The commentor requests that the County restart the process and form a Smart Growth Citizens committee. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.
- Response 206-2:* The commentor is referred to Master Responses 3.4.3 (Water Quality) and 3.4.4 (Water Supply Effects of the Project), as well as Section 4.7 (Hydrology and Water Quality) of the Draft EIR.
- Response 206-3:* The commentor is referred to Response to Comment 206-2. The Nimbus study concluded that there is a total of 24,700 acre-feet annually of groundwater in the Martis Valley Ground Water Basin that is available without changing the volume of water in storage over the long term. Kennedy/Jenks Consultants conducted an independent appraisal of the Nimbus study that states the numbers were conservative and the amount of groundwater available for use was more than estimated by Nimbus. The commentor questions the conclusions of the Nimbus study but provides no evidence to prove it wrong. No further response is necessary.
- Response 206-4:* The commentor is referred to Response to Comment 206-3.
- Response 206-5:* The commentor is referred to Response to Comment 206-3.
- Response 206-6:* The commentor is referred to Master Responses 3.4.2 (Assumptions Used for Development Conditions in the Plan Area) and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR), as well as Response to Comment 206-3.

Letter 207

08-19-02

Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

RECEIVED
AUG 15 2002
PLANNING DEPT.

RE: Draft EIR Report

Dear Assembly:

Please accept my comments on Section 4.9, Policy
6.B. 1.-5.

Coordination of the three Agencies is Peculiar to me.
Has the U.S. Army, always been involved in Biological
Resources? When did they take an interest and why?
Is Biological Resources their Area of Expertise, and
if not, why don't they stick to their own field?
If they want Biological Resources, to be fair some sort
of trade-off should be made regarding the area
of their initial interest outside of Biological Resources.

Item (3), compensation for wetland loss — who is being
compensated? The U.S. Army? That is a total
infringement on the rights of Natural and Biological
Resources. The Army should have nothing to do with this loss.

Who are they, the Pope? Should the Pope be compensated for

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

207-1
Cont'd

Army pay to study Biological Resources,
or ~~take~~ their area of expertise.

207-2

Policy 6.B.5 (C) On a scan of this report,
I am questionable if not skeptical regarding
"acorage replacement." Does this mean
"replacement to nature," or is a real estate
agency benefitting from this.

Carmel Kelly
4449 Hillcrest Way
Pleasanton CA 94588

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 207: **CARMEL KELLY, RESIDENT**

Response 207-1: The U.S. Army Corps of Engineers is responsible for regulation jurisdictional Waters of the U.S. Therefore, the Corps has jurisdiction over Martis Creek Lake. Compensation for loss of wetlands is intended to achieve a "no net loss" of wetlands. The commentor is also referred to Response to Comment F-6.

Responser 207-2: Comment noted. The commentor does not comment on the adequacy of the Draft EIR. Therefore, no response is necessary.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

AUG-19-2002 17:20	PORTER SIMON	Letter 208	530 587 1316 P.02/02
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<p>KELLEY R. CARROLL** PETER H. CUTTITA* STEVEN C. GROSS* STEPHEN C. LIEBERMAN JAMES L. PORTER JR.* JAMES E. SIMON</p> <p><i>Reply to Trustee Office</i></p>	<p>Law Office Of PORTER • SIMON Professional Corporation</p> <p>August 19, 2002</p>	<p>ANDREW J. MORRIS* JAMES L. OLMESTEDT† KENNETH P. CRAIG* KIRK S. PARWANT JULIA E. BURT**</p> <p><small>*Also Licensed in Nevada ** Also Certified Public Accountant †Certified Specialist in Estate Planning, Trusts and Probate Law *Also Licensed in Nevada, Oregon and Washington</small></p>
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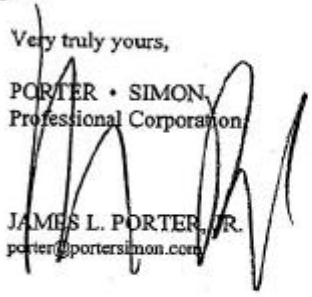
<p><i>Via Facsimile:</i> (775)588-1559 Fred Yeager DESIGN WORKSHOP P.O. Box 5666 298 Kingsbury Grade Stateline, NV 89449</p>	<p>(530) 889-7499 Bill Combs PLACER COUNTY PLANNING DEPT. 11414 B Avenue Auburn, CA 95603</p>
--	---

Re: Martis Valley Community Plan

Dear Mr. Yeager and Mr. Combs:

On behalf of our clients East West Partners, Booth Creek Ski Holdings, Inc. and Northstar-at-Tahoe we respectfully request that the Martis Valley Community Plan and all associated environmental documents, including the environmental impact report, grant reciprocal credits for employee housing and affordable/inclusionary housing. In other words, where a development project contains employee housing, that project should be given credit toward meeting COUNTY affordable/inclusionary housing policies and laws. Conversely, where a project contains affordable/inclusionary housing, that project should be given credit for meeting the COUNTY's housing policies and laws.

Thank you for your consideration of this request.

Very truly yours,
PORTER • SIMON,
Professional Corporation

JAMES L. PORTER, JR.
porter@portersimon.com

JLP:cjg

I:\LO\Clients\East West\MVCPLetter to Yeager and Combs.doc

CC - Commissioners

TRUCKEE OFFICE • 40200 Truckee Airport Rd • Truckee, California 96161 • (530) 587-2002 • Fax (530) 587-1316
RENO OFFICE • Twentieth Century Building • 335 W. First Street • Reno, Nevada 89503 • (775) 322-6767
SOUTH LAKE TAHOE OFFICE • 2269 James Avenue • South Lake Tahoe, California 96150 • (530) 541-8392
www.portersimon.com

TOTAL P.02

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 208: **JAMES L. PORTER, JR., LAW OFFICE OF PORTER AND SIMON**

Response 208-1: The commentor's statements regarding the Martis Valley Community Plan associated with affordable and employee housing are noted and will be forwarded to the Placer County Planning Commission and Board of Supervisors as part of project consideration. The commentor is referred to Master Response 3.4.8 (Affordable and Employee Housing Effects of the Project).

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 209

August 19, 2002

Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

Faxed to (530) 889-7499 on 8/19/02 and delivered via e-mail to LJLawren@placer.ca.gov on 8/19/02.

Subject: Public Review Drafts of the Martis Valley Community Plan and Environmental Impact Report (EIR)

My wife and I are owners within the Northstar Community. We are also registered voters within Placer County. After careful review of the Martis Valley Community Plan and Preliminary Environmental Report (EIR), we believe this **Draft Environmental Impact Report for the Martis Valley Community Plan is inadequate and incomplete**, and that it must be rewritten.

Any analysis of the impacts caused by the proposed projects will be underestimated due to project descriptions that may be incomplete or inadequate. It becomes imperative that **all projects be identified and included in the analysis**. For example, full disclosure of the projected developments, which will occur at Northstar need to be included in the analysis. At this critical stage in the development of Martis Valley the process cannot be "piecemealed." Cumulative Impacts require Cumulative Disclosures.

Since cumulative impacts are not identified, any **mitigation measures for addressing these impacts are inclusive** and therefore public analysis cannot be performed adequately. The full extent of significant environmental impact is not disclosed, specifically the impact on Martis Creek and the watershed environment. Finally, the report fails to analyze a reasonable range of alternatives. Conclusions appear to take the place of actual analysis.

If nothing more **the EIR needs to be rewritten with a higher level of facts and disclosures included**. When the future of the entire valley is at stake, we need more than a superficial boilerplate analysis.

Specific Concerns at Northstar

In addition to the above-mentioned inadequacy of the Martis Valley Draft EIR, we have the following concerns and recommendations with specifics within the Northstar Area. We strongly suggest that the final EIR reflect the following changes.

1. Referenced: Section 4.4, Page 39, First Paragraph "All Connection Option --." And; Referenced: Section 4.4, Page 38, Third Paragraph "Analysis of Roadway --." We are extremely concerned about the **use of the Northstar/Shaffer Mill connector** and future access to the planned "Upper Mountain" (identified by East-West as the Highlands). We support the usage of this road for fire, life, and safety.

Additionally, we support the usage of the Big Springs/Highlands connector road for fire, life and safety. Consideration should be given for an **extension from the Big Springs/Highlands road into the proposed Northstar Village for emergency access** (for fire, life, and safety). This additional emergency access (and the one identified in sub-paragraph number 4) would provide multiple

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

emergency accesses into the village and have the added benefit of serving multiple housing areas (Northstar Village, Northstar Club, Village Condos, Aspen Grove, Ski Trails, Gold Bend, Indian Hills, Big Springs, Highlands (the entire upper mountain area), the Shaffer Mill Area, and Lahotan). These roads should be gated and used for Emergency Access Only , not used for any other type of traffic .	209-6 Cont'd
2. Referenced: Section 4.4, Page 38, Last Paragraph "Conceptual Future Development --." We recommend the inclusion of intercept lots to be located off Northstar Drive close to the current entrance to Northstar Drive at Highway 267. It should be required that the overall day skier parking at Northstar not be increased with the construction of the "Intercept Lots."	209-7
3. Referenced: Section 4.4, Page 38, Paragraph "Proposed Roadway Network --." We do not support the widening of Highway 267 to four lanes. As an alternative, consideration should be given to an extension of the southbound right turn lane to a point in the vicinity of the "Northstar 1-mile" sign on Highway 267.	209-8
4. Referenced: Section 4.4, Page 52, Table 4.4.21 "Extent of Widening --." We do not support the widening of Northstar Drive to four lanes for its entire length . We recommend the following: <ul style="list-style-type: none"> • Widening Northstar Drive to four lanes on Northstar Drive from the Highway 267 entrance to a planned roundabout located in the vicinity of the existing gas station. • Re-grading the existing road section between entrance to Northstar and the planned roundabout for the purpose of improved road safety. • Construction of a third lane from the Northstar Firehouse into the Proposed Northstar Village for Emergency Access Only (fire, life, and safety). 	209-9
5. Referenced: Section 4.2, page 15, Table 4.2-10, Notes 2: Proposed Land Use Diagram The proposed allowable density increase in the Martis Valley Plan is grossly excessive . Density reduction and Environmental Protection should be the direction the future takes us. In addition, as mentioned previously, the total impact cannot be measured without full disclosure of all proposed developments . We do not support the proposed Northstar increase of approximately 2200 units.	209-10
6. Consideration should be given to establishing a forested corridor prohibiting new building construction along Highway 267, mandating conservation easements with any new developments within Martis Valley, and measures to protect our water and streambeds .	209-11
7. Any project, no matter how small, should not be considered insignificant and Environmental Impact Reports should become the norm, not the exception . Neg-Decs do not allow for the analysis of potential environmental impacts <u>into the future</u> . In this day and age Neg-Decs) are inappropriate.	209-12
We appreciate your attention to these requests and allowing for the public to comment.	
<p>Albert J. Roth, Jr. Deborah T. Roth 230 Eve Court Hayward, Ca. 94541</p> <p>4038 Ski View Truckee, Ca.</p>	

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 209: ALBERT J. ROTH, JR. AND DEBORAH T. ROTH, RESIDENTS

- Response 209-1:* Comment noted. The commentor feels that the Draft EIR is inadequate and incomplete. The County considers the Draft EIR adequate for consideration of the project and consistent with the requirements of CEQA.
- Response 209-2:* The commentor is referred to Master Responses 3.4.1 (Project Description Adequacy), 3.4.2 (Assumptions Used for Development Conditions in the Plan Area), and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR).
- Response 209-3:* The commentor is referred to Master Responses 3.4.4 (Water Supply Effects of the Project), 3.4.5 (Adequacy of the Alternatives Analysis), and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR).
- Response 209-4:* The commentor states that the Draft EIR needs to be rewritten with a higher level of facts and disclosures, but the commentor fails to identify the inadequacy of the Draft EIR. This draft EIR provides an extensive analysis of project impacts based on technical reports, mapping, and review by qualified professionals, consistent with CEQA.
- Response 209-5:* The commentor is referred to Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis).
- Response 209-6:* Comment noted. The commentor is referred to Response to Comments D-4 and D-5.
- Response 209-7:* Comment noted. The commentor is referred to Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis).
- Response 209-8:* The commentor is referred to Response to Comment 209-7.
- Response 209-9:* The commentor is referred to Response to Comment 209-7.
- Response 209-10:* The commentor is referred to Master Responses 3.4.2 (Assumptions Used for Development Conditions in the Plan Area) and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR).
- Response 209-11:* Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.
- Response 209-12:* Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.

Letter 210

**Planning and Conservation League
Sierra Club
Environment Now
American Rivers
Sierra Nevada Alliance
Friends of the River
RiverLaw**

Shawn Garvey
The Sierra Fund
409 Spring Street
Nevada City, CA 95959
www.sierrafund.org

August 19, 2002

Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

**Re: Draft Environmental Impact Report for the Martis Valley
Community Plan**

Dear Ms. Lawrence:

The Planning and Conservation League, the Sierra Club, Environment Now, American Rivers, the Sierra Nevada Alliance and Friends of the River hereby submit the following comments regarding the Draft Environmental Impact Report (DEIR) prepared for the Martis Valley Community Plan (MVCP).

We believe that the MVCP violates provisions of state planning and zoning law and that the DEIR does not comply with the requirements of the California Environmental Quality Act (CEQA).

210-1

The MVCP includes up to 9,220 new homes, 1.1 million square feet of new commercial buildings, up to 5 golf courses and a proposed ski area, in a rural area of the High Sierra between Truckee and Lake Tahoe. Some estimate that the MVCP would allow more than double that amount of new residential and commercial development in the Valley.

210-2

The MVCP represents a collection of projects that constitute one of the largest development proposals ever considered in the Sierra Nevada and will have a dramatic effect on water quality, air quality, recreation, suburban development, and traffic throughout the Truckee - Tahoe region. As such, this plan deserves substantial public consideration

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

and scrutiny.

The Martis Valley is a unique landscape and of tremendous environmental and recreational value. As a gateway to Lake Tahoe, proposals to develop the Martis Valley are more than a local or regional concern, but of critical importance to the residents of California and Nevada. Its future is tied irretrievably to that of the entire Sierra range: As may go Martis Valley, so may go the Sierra Nevada.

210-2
Cont'd

It is, then, imperative that Placer County prepares a revised DEIR that fully complies with CEQA, and takes full and accurate account of the tremendous environmental and recreational resources of Martis Valley.

210-3

MVCP is a poster-child for rural sprawl

The Placer County General Plan contains the central planning policies adopted by the County, and those policies are meant to guide the development of the more detailed community plans for specific regions in the County. The proposed MVCP effectively disregards the policies of the Placer County General Plan in setting forth land use designations for the Martis Valley and in this way violates the core of California land use planning law.

210-4

The MVCP frustrates numerous policies of the county's general plan which require concentration of development in existing communities. Instead, the MVCP will transform rural areas of Martis Valley to suburban use and erase the lines between the communities of Truckee and Martis Valley, and between Martis Valley and the north shore of Lake Tahoe.

The MVCP will allow for development throughout the Martis Valley and fails to concentrate growth within existing communities or provide for the development of complete, diverse and balanced communities.

MVCP fails to evaluate dramatic impacts to the environment

The DEIR fails to describe adequately the project setting; fails to analyze the Project's impacts on the environment, including growth-inducing and cumulative impacts; improperly defers identification of mitigation measures; fails to identify feasible mitigation measures; and fails to analyze a reasonable range of alternatives to the Project. Together, these defects in the DEIR undermine any effort at informed planning or decision-making as well as environmental review of the

210-5

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Project.

Proposed land use designations in the MVCP would result in degraded water quality and wetlands throughout the planning area, throughout the Truckee River watershed and in downstream communities surrounding Reno, Nevada.

210-5
Cont'd

The proposed land use designations have the potential to completely alter the biological character and functions of the ecosystems in the Martis Valley. The location and levels of development proposed are inconsistent with the long term protection of these resources and will fragment large areas of intact forest, threaten wildlife movement routes, and eliminate important watershed areas and encroach on intact stream and wetland environments.

The primary purpose of an EIR is to inform the public and responsible officials of the environmental consequences of their decisions before they are made. Accordingly, an EIR must contain facts and analysis regarding a proposed projects' environmental impacts, not just an agency's conclusions.

As such, the DEIR fails:

- To analyze adequately the consistency of the MVCP with existing land use plans and zoning designations; 210-6
- To adequately analyze the Project's impacts on population, housing and employee housing or to support conclusions regarding these impacts; 210-7
- To analyze adequately the risk to human health due to use of toxic chemicals associated with land uses proposed by the Project; 210-8
- To adequately provide a description of existing traffic conditions and fails to support conclusions regarding the Project's contribution to new traffic; 210-9
- To properly assess impacts on air quality; 210-10
- To appropriately analyze the Project's impacts on hydrology and water quality, failing to consider impacts from some components of development allowed under the MVCP, failing to describe adequately the project setting and failing to quantify the Project's impacts on water quality; 210-11
- To properly assess biological resources. The DEIR relies on incomplete data and an inadequate description of the project setting, failing to support its conclusions regarding the Project's biological impacts. 210-12

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

DEIR fails to evaluate impacts to Lake Tahoe

The DEIR fails to address the significant cumulative impacts on the Tahoe Basin. The Tahoe Regional Planning Agency (TRPA) has established 36 indicators of environmental health for the Lake Tahoe region. Of the 36, only seven are currently in attainment.

210-13

With a substantial investment by state and federal taxpayers in protecting and restoring the clarity of Lake Tahoe, the DEIR fails to assess the impact of traffic, fireplaces, water use and recreational activity that up to 9,220 new homes will have on the Lake.

In sum, we believe that the DEIR for the Proposed Martis Valley Community Plan is not adequate and will require significant revision and recirculation..

210-14

On behalf of our organizations and the more than 1.3 million members we represent, thank you for accepting these comments.

Sincerely,

Gerald H. Meral
Executive Director
Planning and Conservation League
926 J Street, Suite 612
Sacramento, CA 95814

Steve Rothert
American Rivers
409 Spring Street
Nevada City, CA 95959

Betsy Reifsneider
Friends of the River
915 - 20th Street
Sacramento, CA 95814

David Myerson
Environment Now
2515 Wilshire Boulevard
Santa Monica, CA 90403

David Kean
Sierra Club, Tahoe Group

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Lori Lawrence - Sierra Martis Valley Sign On 8 19 02.doc

Page

14997 Wolfgang Road
Truckee, CA 96161

Tim Frank
Sierra Club, Challenge to Sprawl Campaign
913 Modoc Street
Berkeley, CA 94707

Todd Hutchins
RiverLaw
216 Main Street
Nevada City, CA 95959

Joan Clayburgh
Sierra Nevada Alliance
PO Box 7989
South Lake Tahoe, CA 96158

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

The **Sierra Nevada Alliance** is a regional coalition of more than 80 grassroots and regional groups working in the Sierra to protect and restore the natural and community values of California's most cherished mountain range.

The **Sierra Club's** grassroots advocacy has made it America's most influential environmental organization. Founded in 1892, The Sierra Club is now more than 700,000 members strong.

California Futures Network (CFN) is a statewide coalition of nearly 100 organizations created to educate and organize at the state, regional and local levels to achieve land use policies that are fiscally, socially and environmentally sound. CFN Affiliates are united in the belief that California should steer public and private investments toward existing developed areas; provide for increased social justice, economic, and housing opportunities; and conserve the state's agricultural and natural lands.

The **Planning and Conservation League** is a nonprofit, statewide alliance of nearly 10,000 citizens and more than 120 conservation organizations united to protect wildlife and restore the quality of California's environment through legislative and administrative action.

American Rivers is a national non-profit conservation organization dedicated to protecting and restoring healthy natural rivers and the variety of life they sustain for people, fish and wildlife. Founded in 1973, American Rivers now has a membership of 30,000.

RiverLaw is the statewide legal advocacy program of the South Yuba River Citizens League, which with 4,800 dues paying members is the largest single-river organization in the United States.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 210: GERALD H. MERAL, PLANNING AND CONSERVATION LEAGUE; STEVE ROTHERT, AMERICAN RIVERS; BETSY REIFSNEIDER, FRIENDS OF THE RIVER; DAVID MYERSON, ENVIRONMENT NOW; DAVID KEAN, SIERRA CLUB; TIM FRANK, SIERRA CLUB, CHALLENGE TO SPRAWL CAMPAIGN; TODD HUTCHINS, RIVERLAW AND JOAN CLAYBURGH, SIERRA NEVADA ALLIANCE

Response 210-1: Comment noted. The County considers the Martis Valley Community Plan and Draft EIR and Revised Draft EIR adequate and in compliance with state laws.

Response 210-2: Comment noted. Since no comments regarding the adequacy of the Draft EIR were received, no further response is required.

Response 210-3: The County considers the Draft EIR and the Revised Draft EIR adequate for consideration of the Martis Valley Community Plan and in compliance with CEQA.

Response 210-4: Comment noted. Since no comments regarding the adequacy of the Draft EIR were received, no further response is required.

Response 210-5: The commentor suggests that the Draft EIR's setting and impact analyses are inadequate and specifically mention concerns associated with water quality and biological resources, but provide no specific reasons or details why the Draft EIR is considered inadequate. The Draft EIR provides an extensive setting and impact analysis that adequately addresses the environmental effects associated with the project. Section 4.7 (Hydrology and Water Quality) and Section 4.9 (Biological Resources) of the Draft EIR provide detailed analysis of natural resource impacts of the project based on field review, technical reports and review by qualified professionals. The commentor is referred to Master Response 3.4.3 (Water Quality) and 3.4.5 (Adequacy of the Alternatives Analysis).

Response 210-6: Draft EIR pages 4.1-23 through -30 specifically address project's consistency with relevant land use plans and standards.

Response 210-7: The commentor is referred to Master Response 3.4.8 (Affordable and Employee Housing Effects of the Project).

Response 210-8: The Draft EIR references the Hazardous Waste Management Plan adopted by Placer County in January 1989. Placer County General Plan policies 8.G.1, 8.G.2, 8.G.5 and 8.G.12 require consistency with state, local and federal standards, and require that the County strictly regulate the storage of hazardous materials and wastes. (Draft EIR page 4.3-14) Policy 6.H.22 of the Martis Valley Community Plan Update states that "The County shall encourage and work with the Truckee Fire Protection District and Northstar CSD to develop coordinated all-hazard disaster response procedures for the following types of disasters: wildfires, flooding, earthquake, severe winter storms, transportation accidents, acts of terrorism, civil disturbance, and hazardous materials releases." Policy 9.H.4. of the Martis Valley Community Plan Update states "The County shall encourage project proponents to consult early in the planning process with the County regarding the applicability of countywide indirect and area wide source programs and transportation control measures

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

(TCM) programs. Project review shall also address energy efficient building and site designs and proper storage, use, and disposal of hazardous materials." Implementation of the policies contained within the Placer County General Plan, the Martis Valley Community Plan Update and applicable local, federal and state regulations, addresses the potential for hazardous materials within the Plan area. In addition, the land uses designations set forth in the Martis Valley Community do not typically involve the use of significant quantities hazardous materials.

Response 210-9: The Draft EIR provides detailed information regarding study area roadways, year 2001 LOS conditions at study area intersections and roadway segments as well as provides accident data (Draft EIR pages 4.4-1 through -16). This information is utilized in the traffic impact analysis provided in the Draft EIR. The commentor is referred to Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis).

Response 210-10: Draft EIR pages 4.6-9 through -20 and Appendix 4.6 provide a detailed analysis of anticipated air quality impacts of the project. The commentor is also referred to Master Response 3.4.6 (Consideration of Impacts to the Tahoe Basin).

Response 210-11: The commentor is referred to Master Response 3.4.3 (Water Quality) and 3.4.4 (Water Supply Effects of the Project).

Response 210-12: The commentor suggests that the biological resources analysis in the Draft EIR is inadequate and does not fully address the project's direct, indirect and cumulative impacts. Section 4.9 (Biological Resources) of the Draft EIR utilizes several sources of information and studies, biological resource evaluations for individual properties within the Plan area as well as detailed vegetative and habitat mapping. This section also notes applicable local, state and federal policies and regulations associated with biological resources. Thus, Section 4.9 of the Draft EIR is consistent with the setting requirements of CEQA Guidelines 15125.

Response 210-13: The commentor is referred to Master Response 3.4.6 (Consideration of Impacts to the Tahoe Basin).

Response 210-14: Comment noted. The County considers the Draft EIR and the Revised Draft EIR adequate for consideration of the Martis Valley Community Plan and in compliance with CEQA.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 211

Gavin Moynahan
726 Conifer
Truckee, California 96161
(530) 562-0401

July 23, 2002

Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 B Avenue
Auburn, California 95603

RE: Martis Valley Community Plan Update
Draft Environmental Impact Report SCH No.:2001072050

Dear Ms. Lawrence:

The Fire Protection Services section of the Draft EIR does not adequately address the additional numbers of emergency personnel and equipment that will be needed to respond to resort development in the higher elevation Wildland/Urban Interface areas.

Both the Northstar CSD Fire Department and the Truckee Fire Protection District would be heavily taxed if required to respond to the additional locations being considered for new resort development. Depending on Mutual Aid agreements is not an excuse for lacking the necessary local fire protection infrastructure.

The type of terrain located at Northstar's mid mountain (The Highlands), DMB Highlands Group, LLC and the Sierra Pacific project will require additional staffing, equipment and stations that will come at considerable expense.

The existing residents of the Northstar Community Service District and the Truckee Fire Protection District should not be expected to shoulder this expense.

The statement that the California Department of Forestry and Fire Protection, CDF does not charge for fire protection services is true, but does not address the serious lack of funding that they are currently experiencing in their budget. This places both residents and firefighters at increased risk when building in the wildland urban interface. Just because CDF has jurisdiction over a region does not guarantee it will provide immediate coverage. If their engines are out of county, then it is likely no additional resources will be available to cover in their absence.

Additionally, CDF guidelines for new development projects within their jurisdiction require significant 'reduction of fuel loading of the entire project' which translates into removal of many aesthetic native plants and large trees that are in the conceptual plans of the proposed new resorts. CDF also calls for the use of non-combustible building materials and this further conflicts with the architectural renderings and descriptions currently being submitted.

What emergency egress/evacuation studies were considered in case of a major wildland fire in these locations? Shelter in place is not always an option and would have resulted in hundreds of deaths in the Oakland Hills and Malibu Fires. How will two

211-1

211-2

Gavin Moynahan, 726 Conifer, Truckee, California, 96161 (530) 562-0401

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

lane roads safely handle the exodus of hundreds of motor vehicles while supporting incoming fire suppression apparatus? How will the presence of a large population of seasonal visitors and tourists effect safe evacuation if they are unfamiliar with local roads and topography? Will there be enough Law Enforcement to assist Fire during a major wildland fire?

211-2
Cont'd

If additional egress roads are required to protect the growing population what impact will this have? Were studies conducted to safely project resort population during the wildland fire season regarding safe and orderly evacuation from these new resort developments?

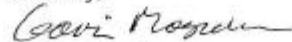
211-3

It is in our best interest to protect existing businesses and residents from additional fire suppression expenses. It is also important to support local firefighters with adequate staffing and equipment as they take on additional responsibilities protecting residents in even more remote wildland resort areas.

211-4

As a 10-year veteran of the fire service I thank you for looking into this important topic.

Sincerely,



E-MAIL SENT AUGUST 19TH

Gavin Moynahan

gmoynahan@aol.com

Gavin Moynahan, 726 Conifer, Truckee, California, 96161 (530) 562-0401

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 211: **GAVIN MOYNAHAN, RESIDENT**

Response 211-1: Comment noted. The commentor is referred to pages 4.11-1 through -17 in Section 4.11 (Public Services and Utilities) of the Draft EIR, including County policies, implementation programs and mitigation measures contained in this section. As noted in Section 4.11, CDF does not respond to structural fires. The commentor does not provide any evidence to support the claim that existing funding mechanisms are inadequate to cover future impacts resulting from increased development in the Plan area. Consultation with the agencies confirm that impacts would be less than significant. The commentor is also referred to Comment Letters A and D.

Response 211-2: The commentor is referred to Response to Comment 211-1. Additionally, regarding emergency access, there are three ways out of the Plan area, including two river crossings: Old SR 267, SR 267 Bypass, and SR 267 into the Tahoe Basin. The Town of Truckee also has conceptual plans for an additional roadway crossing of the railroad tracks and river. The Truckee-Tahoe Airport could be used for emergency evacuation and the golf courses and open valley area would provide fire breaks in the case of a major fire.

Response 211-3: The commentor is referred to Response to Comments 211-1 and 211-2. Impact 4.11.1.1 Fire Protection and Emergency Medical Services in Section 4.11 (Public Services and Utilities) of the Draft EIR includes an impact analysis of impacts to TFPD, CSD, and CDF. The policies and implementation programs in the Martis Valley Community Plan require projects to meet local and state fire regulations, including emergency access, fire breaks, etc. per Public Resources Code 4290 and mitigation measure MM 4.11.1.1 would reduce impacts to less than significant.

Response 211-4: The commentor is referred to Response to Comment 211-1 and 211-2.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 212

Gavin Moynahan
726 Conifer
Truckee, California 96161
(530) 562-0401

July 27, 2002

Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 B Avenue
Auburn, California 95603

RE: Martis Valley Community Plan Update
Draft Environmental Impact Report SCH No.:2001072050

Dear Ms. Lawrence:

The Draft EIR does not adequately address what effects additional amounts of effluent will have downstream on the Truckee River.

What impact will the additional discharge of treated human waste and untreated run-off have to the urban populations of Reno and the State of Nevada?

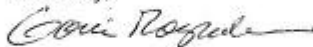
Were the impacts of the additional bypassed chemicals including pharmaceuticals and antibiotics studied regarding potential toxic effects to aquatic fish, plants and invertebrates?

How will the ranchers and farmers of Nevada be affected by these impacts?

Were the Native American tribes who own property or have interests along the Truckee River and Pyramid Lake notified of the proposal to further develop the Martis Valley and impact the water quality of the Truckee River?

I thank you for looking into this important issue that effects citizens of both California and Nevada that rely on the Truckee River as their water source.

Sincerely,



Gavin Moynahan

gmoynahan@aol.com

EMAIL SENT AUGUST 19TH

212-1

Gavin Moynahan, 726 Conifer, Truckee, California, 96161 (530) 562-0401

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 212: **GAVIN MOYNAHAN, RESIDENT**

Response 212-1: The commentor is referred to Master Response 3.4.3 (Water Quality) and 3.4.4 (Water Supply Effects of the Project), as well as Section 4.7 (Hydrology and Water Quality) of the Draft EIR. Regarding farmers in Nevada, the Master Response 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR). Also, the commentor expresses concern that the Native American tribes along the Truckee River or the Pyramid Lake Paiute Lake Tribe were not consulted with regard to water quality issues. The commentor is referred to Response to Comment 187-2.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 213

Gavin Moynahan

726 Conifer

Truckee, California 96161

(530) 562-0401

August 10, 2002

Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 B Avenue
Auburn, California 95603

RE: Martis Valley Community Plan Update
Draft Environmental Impact Report SCH No.:2001072050

Dear Ms. Lawrence:

The Martis Valley Community Plan study area was not large enough to adequately address all the potential growth inducing impacts to the communities it will affect, specifically: resort operated North Lake Tahoe concessions.

It is not clear what is actually for sale in the collateral materials that East West Partners is distributing to solicit resort home sales in the Martis Valley study area.

213-1

There sales promotional book entitled *THE VISION*, specifically states "East West Partners, one of the visionaries behind Beaver Creek Resort in Colorado, will engage their foresight and passion for excellence to create North America's premier four-season resort experience; to enhance the overall lifestyle experience in North Lake Tahoe."

The goal of these resorts is to put people within a few miles of Lake Tahoe's north shore and then encourage them to patronize restaurants and concessions that they operate Lakeside. This is a direct conflict with the 'End Destination' resort design that Fiberboard originally created at Northstar to discourage unnecessary trips and thus reduce additional traffic.

The Martis Valley Draft EIR does not adequately study the potential of this 'Growth Inducing Impact.' What additional traffic will result if the new and existing resorts each purchase 2 Lakeside businesses? What will the impact will result if they purchase 5? What impact will hundreds of additional trips over SR 267 be to the communities of North Lake Tahoe regarding traffic, pollution and biological degradation?

213-2

What limits will be required on the new and existing resorts to keep extra vehicle trips to a minimum considering the push to encourage guests to drive over SR 267? At what point will the use of Lakeside concessions operated by resorts based in the Martis Valley impact Lake Tahoe's clarity and North Lake Tahoe's quality of life?

213-3

I feel additional information must be researched and plan specific models must be studied before assumptions on impacts to surrounding communities can be made.

213-4

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

These outlying communities are not adequately addressed in the Draft EIR but are directly affected by the developer's plans to build and occupy Lakeside concessions.

213-5

Thank you in advance for the Planning Department's consideration on this important subject. I know it is Placer County's goal to 'Keep Tahoe Blue' and preserve the special quality of life for existing North Lake Tahoe residents and businesses.

Sincerely,


Gavin Moynahan

EMAIL SENT AUGUST 19TH

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 213: **GAVIN MOYNAHAN, RESIDENT**

Response 213-1: The commentor is referred to Master Responses 3.4.6 (Consideration of Impacts to the Tahoe Basin), 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR), as well as Section 7.0 (Long Term Implications) of the Draft EIR regarding concerns relating to potential growth inducing impacts to North Lake Tahoe. The commentor's concern regarding the collateral materials that East West Partners are distributing to solicit resort homes sales is not an environmental issue and is not within the scope of the Draft EIR.

Response 213-2: The commentor is referred to Response to Comment 213-1.

Response 213-3: The commentor is referred to Response to Comment 213-1. The commentor is also referred to Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis).

Response 213-4: The commentor thinks additional information must be researched and plan specific models must be studied before assumptions on impacts to surrounding communities can be made. The commentor fails to identify the inadequacy of the Draft EIR and to identify what surrounding communities and what additional information is required. Therefore, no further response is necessary.

Response 213-5: The commentor is referred to Response to Comment 213-4.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 214

Gavin Moynahan

45 North Tenth Street, San Jose, California 95112
726 Conifer, Truckee, California 96161
(530) 562-0401 (408) 294-9649

PLACER COUNTY
DATE
RECEIVED

July 13, 2002

Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 B Avenue
Auburn, California 95603

AUG 19 2002

PLANNING DEPARTMENT

RE: Martis Valley Community Plan Update Draft Environmental Impact Report SCH
No.:2001072050

Dear Ms. Lawrence:

I am interested in seeing Placer County's plan for the Martis Valley be the best possible document to protect and ensure a healthy future for this special area.

I feel strongly that the Draft has underestimated the number of occupants that will be patronizing the new homes, condos and 'shared ownership' facilities that are slated for the Martis Valley region of Placer County.

The Draft uses occupancy rates as low as 20% with only 2.63 humans per household. I question how those numbers were reached? The Martis Valley plan area is unique and not easily represented by Census Data or Sacramento Area Council of Governments population estimates. The documentation in the Draft EIR only cites Martis Valley Vacation Rentals for rental information statistics. Was information obtained from Northstar at Tahoe, Sierra Resort Vacation Rentals or Trident Holdings? They all have significant rental units in the Martis Valley.

The Draft assumes that many single family vacation homes are not rented. This doesn't accurately address the number of homes that are frequently occupied by unaccounted for friends, family and guests.

Example: The Smith Family owns a home on Conifer and is retired with two sons. They use their Northstar home as a second residence and do not rent, however, Roseanne frequently lets her sister in law and girlfriends use their home along with their husbands during the weeks that she stays down in Sacramento. And then there are her sons. No Census data, voter registration or IRS rental income data will highlight this pattern of occupancy.

Our Truckee home is another example, it is held in Trust and has multiple family members with ownership rites and revolving usage. Again this creates significant additional occupancy figures not considered in the Draft.

Northstar at Tahoe's rental income and occupancy statistics for the year 2001 show that of all the homes and condos on their program occupancy was never less than 28 percent with units ranging from 27.94% to 47.39%. Northstar's smallest units have a listed

214-1

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

occupancy of two and the largest ten. Northstar's rental program requires owners of one-bedroom condos to provide 'additional sleeping surfaces' for two additional guests in the form of a hide-a-bed or sleep mats. Thus making their smallest one bedroom condo a 'potential' four-person unit.

Shared ownership, timeshares or fractional ownerships would again under represent actual usage. One-seventh fractional ownerships allow each family/owner a visit approximately once every other month. If you're only allowed to visit seven times per year wouldn't you expect that most owners would? Statistical information on actual usage is available and should be used to calculate a more accurate number of potential visitors to the Martis Valley region of Placer County.

I would like to know why research on fractional ownership use was not included? What percentage of the total number of units built will be sold fractionally and how will that be monitored? Many of the developers have already stated their interest in fractional ownership sales to boost yearly resort visits.

Star Resorts which occupies and manages the Northstar Club is one such example it offers its members "potentially unlimited use" and even extends benefits to its owners from their other resorts. This is a standard privilege of 'shared ownership' within the resort industry. Additionally reinforcing that Draft occupancy percents are not realistic. It is possible, although not likely, that their facility could be occupied 100%. This scenario multiplied by hundreds of new additional fractional ownerships would yield significant increases in population not accounted for in the DEIR.

Property managers and resorts restrict the number of registered guests to a maximum for each unit. Interviewing resort and property management housekeepers yields an interesting finding. Often times a unit is occupied by up to twice the number of guests registered. This again under represents 'front desk' statistics.

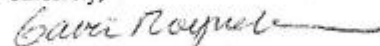
What research was conducted on retirement statistics to second homes in the Martis Valley? "We are going to retire here" is a common mantra from second homeowners and a longstanding American tradition.

This lack of research on actual population statistics in the Martis Valley and resort build-out plans leads me to question the occupancy percentages that the Draft is using.

Please provide detailed and complete population/occupancy research information regarding the subjects listed in this query. It is important to know the number of people that will influence the Martis Valley and impact the Tahoe National Forrest.

Thank you for considering my questions and comments. I take pride in owning property in Placer County.

Sincerely,


Gavin Moynahan

214-1
Cont'd

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 214: **GAVIN MOYNAHAN, RESIDENT**

Response 214-1: The commentor is referred to Master Responses 3.4.2 (Assumptions Used for Development Conditions in the Plan Area) and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR), as well as Section 4.2 (Population/Housing/Employment) of the Draft EIR. The analysis evaluates 100 percent occupancy of the Plan area. An analysis of fractional ownership is not necessary because it would have less of an impact than 100 percent occupancy of the Plan area.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 215

Gavin Moynahan
726 Conifer
Truckee, California 96161
(530) 562-0401

PLACER COUNTY
DATE
RECEIVED

AUG 19 2002

PLANNING DEPARTMENT

August 11, 2002

Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 B Avenue
Auburn, California 95603

RE: Martis Valley Community Plan Update Draft Environmental Impact Report
SCH No.:2001072050

Dear Ms. Lawrence:

I am writing offer some suggestions and raise a few questions regarding the 'Alternatives' section covered in the Martis Valley Community Plan Draft EIR.

The Martis Valley Community Plan Draft Environmental Impact Report does not offer a range of options under 'Alternatives' that improves or retains the current features that make this region desirable. A reasonable list of alternatives should include plans that do not jeopardize the very attributes that make the area attractive.

The following are some areas that would benefit from additional 'Alternate' plans that do not compromise the Valley's future:

Impact 4.9.12 Loss of Special-Status Species and their Habitat, Interference of Wildlife Movement, and Fragmentation of Habitat

All four draft options produce 'cumulative significant impacts'.

It is unnecessary to damage habitat and risk Special-Status Species for new resort building on sensitive ecosystems.

Impact 4.4.1 Potential to Exceed an Established Level of Service Standard

All four draft options produce 'significant impacts'.

Traffic is the number one complaint of visitors and the reason many people do not want to visit or ski in the region. If traffic is projected to increase how will this affect the already established resorts? Is it sensible to make traffic worse with additional construction of additional resorts? At what point will the Martis Valley start to lessen as a destination because of the increased traffic?

Impact 4.1.3 Loss of Forest and Timber Lands

All four draft alternatives produce 'significant impact'

The forest and trees are the key reasons people come to the beautiful Martis Valley. How can the County take responsibility for damaging the lifeblood of the region? There should be an alternative that doesn't create a significant impact to the Tahoe National Forest.

Gavin Moynahan, 726 Conifer, Truckee, California 96161 (530) 562-0401

215-1

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

The Impacts listed above are not an exhaustive list of the important areas facing 'significant or cumulative significant' changes that need additional study under the current Draft.

The reason people come to the Martis Valley is for its scenic beauty, outdoor recreation and improved quality of life not found in the California's major urban areas. It would be counterproductive to make the Valley more urban and would result in potential damage to established businesses and reduced property values.

One option that needs to be explored is the 'Transferring of Development Rites Alternative'. This is a widely accepted practice in California and has had wonderful results. The purchase of development rites needs to be investigated in depth and would serve the business interests of the major landowners as well as existing residents and ecosystems. The fact that Placer County has no established program should not prevent exploring this option. The Draft says that it would not be consistent with Land Use but fails to explore in earnest the potential for offsetting the numerous 'significant' impacts that are unavoidable under the four proposed Draft plans.

Please consider my comments and queries when producing your final EIR. I know through a combined input of citizens and landowners we can create a wonderful plan for preserving the natural beauty of the Martis Valley for the next 20 years.

Sincerely,



Gavin Moynahan

215-1
Cont'd

Gavin Moynahan, 726 Conifer, Truckee, California 96161 (530) 562-0401

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 215: **GAVIN MOYNAHAN, RESIDENT**

Response 215-1: The commentor is referred to Master Responses 3.4.5 (Adequacy of the Alternatives Analysis).

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 216

PLACER COUNTY
DATE
RECEIVED

AUG 19 2003

PLANNING DEPARTMENT

Attn: Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 "B" Avenue
Auburn, CA 95603

RE: Draft Environmental Impact Report for the Proposed Martis Valley Community Plan update, SCH
No: 2001072050

Dear Ms. Lawrence:

Thank you for the opportunity to comment on this draft environmental impact report. First, I have three requests: 1) As the DEIR is a very complicated document, and it is very time intensive to review environmental impacts and correlate them to appropriate Placer county policies, goals, and mitigation measures, I request an extension of the public comment period. 2) By my examination thus far, it is evident that this DEIR neither follows the letter of or the intent of the California Environmental Quality Act, and I therefore request that a revised DEIR that meets CEQA requirements be completed and recirculated for public review. 3) One of the glaring faults of the DEIR is that there was virtually no public input for this plan. There was no representation for the environmental community, the affordable housing community, TRPA, the Lake Tahoe Community, Nevada County, the Town of Truckee, diversification of the economy proponents, and sustainable economic experts. All of these citizens have a stake and a voice in the future of their community, and none were effectively represented. I therefore request that the present planning process be stopped and a new state of the art Smart Growth Citizens committee be formed that will do a true community visioning process that looks at all the interest of this diverse community.

216-1

Large land owners and developers are in the business of paying off their banks and equity partners and making sure there is a large return on investment for themselves. It is in their best interests to always maximize the amount of units and/or coverage that they can achieve, and minimize the amount of land that is not available for development.

216-2

As an example, the proposed community plan really allows for 20,467 units (DEIR table 4.2-10), with an adjusted holding capacity of 9,220 units. What law will hold the developers to 9,220 units total? How was the standard 20% reduction calculated? Was all the developable land in the Martis Valley, and only the land in Martis Valley, reviewed to determine a "standard deduction" for the Martis Valley specifically? If not, why not? What is the margin of error in the 20% standard deduction (table 4.2-10)? All numbers calculated with data will have a range of error. Please provide all the data available and justify the margin of error, then, report the adjusted holding capacity with a realistic margin of error. Without this margin of error, the range of impacts cannot be properly calculated, and the DEIR therefore understates these impacts. Please recalculate all impacts studied in the DEIR, including but not limited to, all impacts identified in table 2.0-1. Please pay special attention to and calculate the effects on affordable housing, water use, traffic, fragmentation of wildlife habitat, loss of species, air pollution (ozone and pm10 particles), and report the increase in asthma and heart attacks inherent with increases in air pollution over levels in the Martis Valley at the present.

216-3

Also, the plan understates the possible level of permanent occupation of the units in the future. This number is then used to calculate all impacts in the valley. Please do a detailed study on the present purchasers for vacation homes in resorts. Take into account that they are baby boomers nearing

216-4

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

retirement and that many have plans to retire in their vacation homes. Report this information in the DEIR with real margins of error. Please take into account information available from, and why not do a joint study with Nate Hutcheson of the American Planning Association? I am sure the APA would love to do a definitive study of a resort area as important as the Truckee/Lake Tahoe area.

For your information, and as a start to this investigation, see the APA's newsletter for resorts (Mountains and Shores-Summer 2002). In the article "Huge Boom in Residential Migration to Resort Towns Concerns Locals, Planners," the author, in part says:

"Vacation spots typically inhabited by a small number of locals in the off-season are attracting residential migration in record numbers, and developing year round community conflicts. These locations typically offer coastal, mountain, and lakeside recreation areas, natural beauty, fresh air, and entertainment options. But those who used to come and visit are now coming to stay permanently. As APA researcher Nate Hutcheson reports in Zoning News, a publication of the American Planning Association, communities that offer such luxuries are now prime candidates for land use conflicts. "Americans are on the move to resort destinations", says Hutchenson. "The populations of traditional get-away destinations are surging, and planners are coming face to face with new social, economic, and public health challenges because of this." Residential migration to vacation destinations is estimated at 700,000 to 1.6 million people per year... The task for planners seems to be defining and maintaining a balance between year-round, seasonal, and vacationing people while considering the effects on property, the well-being of the community, and a thriving economy."

216-4
Cont'd

This DEIR is fundamentally flawed in the most basic of data collection and analysis. It in every instance possible understates the true level of impact to the economic, social, and environmental health of the Martis Valley Community. This process could be greatly enhanced by a community visioning process that takes into account the economic and environmental concerns of all community stakeholders.

216-5

Sincerely,



Shannon Raborn
Chair, Tahoe Area Sierra Club Group
PO Box 4918
Incline Village, NV 89450

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 216: **SHANNON RABORN, TAHOE AREA SIERRA CLUB GROUP**

- Response 216-1:* Comment noted. The County considers the Draft EIR and the Revised Draft EIR adequate for consideration of the Martis Valley Community Plan and in compliance with CEQA. The commentor is referred to Master Response 3.4.9 (Adequacy of the Public Review Period).
- Response 216-2:* Comment noted. Since no comments regarding the adequacy of the Draft EIR were received, no further response is required.
- Response 216-3:* The commentor is referred to Master Response 3.4.1 (Project Description Adequacy) and 3.4.2 (Assumptions Used for Development Conditions in the Plan Area).
- Response 216-4:* The commentor is referred to Master Response 3.4.2 (Assumptions Used for Development Conditions in the Plan Area).
- Response 216-5:* Comment noted. The County considers the Draft EIR and the Revised Draft EIR adequate for consideration of the Martis Valley Community Plan and in compliance with CEQA.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 217



Conservation Biology Institute

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PLACER COUNTY
DATE
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AUG 19 2002

PLANNING DEPARTMENT

August 15, 2002

Ms. Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 "B" Avenue
Auburn, CA 95603

Subject: **Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050**

Dear Ms. Lawrence:

The Conservation Biology Institute (CBI) is a non-profit, science support organization, with expertise in habitat conservation planning, environmental impact studies, and special status species conservation and recovery efforts. On behalf of Sierra Watch, CBI has reviewed the Martis Valley Community Plan (MVCP) update and the Biological Resources section of the Draft Environmental Impact Report (DEIR). The attached comments address: (1) the consistency of the proposed Land Use diagram in the MVCP update with policies for natural resources protection established in the Placer County General Plan (GP), (2) the Biological Resources Section of the DEIR, and (3) recommendations for improving the DEIR and developing a conservation-based alternative for the MVCP update that is consistent with the land use policies adopted by the County.

Our qualifications can be summarized as follows. Michael White has over 16 years of experience conducting ecological research, species and habitat conservation programs, and impact assessment studies throughout the Southwestern U.S. and the Pacific Rim. Jerre Stallcup has 20 years of experience in the management of large biological and GIS conservation planning studies and environmental impact studies for nonprofit organizations and government agencies, both in the U.S. and abroad. We have extensive experience with the California Environmental Quality Act (CEQA), National Environmental Policy Act (NEPA), Clean Water Act, and federal and state Endangered Species Acts, including Natural Community Conservation Planning efforts in southern California.

217-1

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Lori Lawrence
Pg. 2

We thank you for the opportunity to comment on the DEIR. Please feel free to contact us if you require any additional information or wish to discuss any of these issues.

217-1
Cont'd

Sincerely,



Michael D. White, Ph.D.



Jerre Ann Stallcup, M.A.

Cc: Terry Watt

attachment

CBI COMMENTS AND RECOMMENDATIONS

1. The proposed Land Use diagram in the Martis Valley Community Plan (MVCP) update is inconsistent with many of the progressive policies established by the Board of Supervisors in the Placer County General Plan (GP). These policies promote the protection and restoration of natural resources and other elements that affect the quality of life of the citizens of Placer County. The following sections present relevant GP policies and describe inconsistencies of the proposed Land Use diagram with these policies.

217-2

Policy 6.B.3. The County shall discourage direct runoff of pollutants and siltation into wetland areas from outfalls serving nearby urban development. Development shall be designed in such a manner that pollutants and siltation will not significantly adversely affect the value or function of wetlands.

The proposed Land Use diagram in the MVCP update will result in degraded water quality in waterbodies and associated wetlands in the planning area. The proposed Land Use diagram establishes development zones within significant percentages of the subwatersheds for Martis Creek, East Martis Creek, and Martis Creek Lake and their associated wetland habitats. Urban land uses produce substantial loads of nutrients (nitrogen and phosphorus), metals, oil and grease, and suspended sediments that are carried to downstream waterbodies by runoff from impervious surfaces such as streets and roads, and structures. Golf courses and landscaped parks also contribute significant pollutant loads from applications of fertilizers, herbicides, and pesticides. Many of these chemicals are not easily removed from urban runoff and will be transported to downstream wetlands and waterbodies.

217-3

Policy 6.C.1. The County shall identify and protect significant ecological resource areas and other unique wildlife habitats critical to protecting and sustaining wildlife populations. Significant ecological resource areas include: a) wetlands areas including vernal pools, b) stream environment zones, c) any habitat for rare, threatened or endangered animals or plants, d) critical deer ranges (winter and summer), migratory routes, and fawning habitat, e) large areas of non-fragmented natural habitat, f) identifiable wildlife movement zones, including but not limited to, non-fragmented stream environment zones, avian and mammalian migratory routes, and known concentration areas of waterfowl within the Pacific Flyway, and g) important spawning areas for anadromous fish.

217-4

The proposed Land Use diagram has the potential to completely alter the biological character and functions of the ecosystems in the Martis Valley. The Martis Valley Community Planning area supports or potentially supports all of the significant ecological resource areas and unique wildlife habitat addressed by this policy. The locations and levels of development proposed are inconsistent with the long-term

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

protection of these resources. Proposed development zones fragment large areas of intact forest, threaten wildlife movement routes and deer fawning areas, and eliminate important watershed areas and encroach on intact stream and wetland environments.	217-4 Cont'd
<i>Policy 6.C.2. The County shall require development in areas known to have particular value for wildlife to be carefully planned and, where possible, located so that the reasonable value of the habitat for wildlife is maintained.</i>	217-5
The proposed development zones in the MVCP update are not carefully planned with respect to the maintenance of wildlife value. Development zones are located in unfragmented habitat and sensitive watershed areas and encroach on wetland and stream systems. Careful planning dictates that these high value habitat areas be avoided.	
<i>Policy 6.C.6. The County shall support preservation of habitats of rare, threatened, endangered, and/or other special status species. Federal and state agencies, as well as other conservation organizations, shall be encouraged to acquire and manage endangered species habitats.</i>	217-6
The development allowed by the MVCP update would diminish habitat value for special status species. Several special status species occur or could potentially occur in the Martis Valley Community Planning area. The proposed development would diminish habitat value for special status species, preclude the use of Martis Valley as a recovery area for the Lahontan cutthroat trout, and discourage conservation activities by federal and state agencies and conservation organizations.	
<i>Policy 6.C.7. The County shall support the maintenance of suitable habitats for all indigenous species of wildlife, without preference to game or non-game species, through maintenance of habitat diversity.</i>	217-7
The proposed Land Use diagram will significantly alter the character and functions of several natural habitat types in the Martis Valley Community Planning area, thereby diminishing their long-term value to wildlife.	
<i>Policy 6.C.8. The County shall support preservation or reestablishment of fisheries in the rivers and streams within the county, whenever possible.</i>	217-8
The presence of residential development and golf courses adjacent to the stream system would eliminate the opportunity to restore vital spawning and rearing habitat for the endangered Lahontan cutthroat trout in the Martis Valley Creek system.	
<i>Policy 6.C.13. The County shall support and cooperate with efforts of other local, state, and federal agencies and private entities engaged in the preservation and protection of significant biological resources from incompatible land uses and development. Significant biological resources include endangered, threatened or rare species and their habitats, wetland habitats, wildlife migration corridors, and locally-important species/communities.</i>	217-9
The proposed Land Use diagram will result in significant degradation of the biological value of the area, resulting in diminished potential for meaningful conservation actions	
Conservation Biology Institute	2

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

and increasing the complexity of resource management. Several governmental and non-governmental organizations are actively engaged in conservation and management of biological resources in the Martis Valley Community Planning area.	217-9 Cont'd
<p><i>Policy 6.C.14. The County shall support the management efforts of the California Department of Fish and Game to maintain and enhance the productivity of important fish and game species (such as the Blue Canyon and Loyalton Truckee deer herds) by protecting identified critical habitat for these species from incompatible suburban rural residential, or recreational development.</i></p> <p>The land use changes proposed in the MVCP update will significantly alter the habitats of important fish and game species. The proposed Land Use diagram will result in significant degradation of movement corridors and fawning areas of the Loyalton Truckee deer herd. In addition, Martis Lake currently supports a Wild Trout designation, and the Martis Creek system supports productive trout populations.</p>	217-10
<p><i>Policy 6.D.6. The County shall ensure the conservation of sufficiently large, continuous expanses of native vegetation to provide suitable habitat for maintaining abundant and diverse wildlife.</i></p> <p>The proposed Land Use diagram will result in substantial loss and fragmentation of native vegetation communities in the planning area. The DEIR acknowledges that these vegetation communities have the potential to support a diversity of wildlife species, including several special status species.</p>	217-11
<p><i>Policy 6.D.7. The County shall support the management of wetland and riparian plant communities for passive recreation, groundwater recharge, nutrient catchment, and wildlife habitats. Such communities shall be restored or expanded, where possible.</i></p> <p>The proposed Land Use diagram will result in the loss and degradation of wetland and riparian vegetation communities in the Martis Creek watershed. The proposed Land Use diagram will result in loss of upland buffer areas in the watershed, consumption rather than recharge of groundwater resources, and increased loading of nutrients from urban and recreational development. Development of additional golf courses in the planning area will also result in draw-down of groundwater resources for irrigation and fertilizer applications.</p>	217-12
<p><i>Policy 6.D.8. The County shall require that new development preserve natural woodlands to the maximum extent possible.</i></p> <p>The proposed Land Use diagram will result in substantial loss and fragmentation of intact woodlands in the planning area.</p>	217-13
<p><i>Policy 6.D.9. The County shall require that development on hillsides be limited to maintain natural vegetation, especially forests and open grasslands, and control erosion.</i></p> <p>The proposed Land Use diagram allows new development in hillside areas that currently support unfragmented forest habitats. This development will increase erosion of sediments into the Martis Creek system.</p>	217-14
Conservation Biology Institute	3

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Policy 6.E.1. The County shall support the preservation and enhancement of natural land forms, natural vegetation, and natural resources as open space to the maximum extent feasible. The County shall permanently protect, as open space, areas of natural resource value, including wetlands preserves, riparian corridors, woodlands, and floodplains.

217-15

The proposed Land Use diagram allows development in unfragmented forest and along tributaries of the Martis Creek system and associated wetlands and floodplains.

Policy 6.E.2. The County shall require that new development be designed and constructed to preserve the following types of areas and features as open space to the maximum extent feasible: a) High erosion hazard areas; b) Scenic and trail corridors; c) Streams, streamside vegetation; d) Wetlands; e) Other significant stands of vegetation; f) Wildlife corridors; and g) Any areas of special ecological significance.

217-16

The proposed Land Use diagram is not designed to preserve the natural resources listed in the County policy but in fact will result in their loss, fragmentation, and long-term degradation. The majority of development allowed under the proposed Land Use diagram will be located adjacent to the Martis Creek system, associated wetlands, and forest buffers in the watershed.

Policy 6.E.3. The County shall support the maintenance of open space and natural resources that are interconnected and of sufficient size to protect biodiversity, accommodate wildlife movement, and sustain ecosystems.

217-17

The DEIR acknowledges that the proposed Land Use diagram will produce cumulatively significant habitat fragmentation and loss of major wildlife movement corridors. We concur with this assessment.

2. The Biological Resources section of the Draft Environmental Impact Report (DEIR) is inadequate or flawed, as documented by the following comments.

217-18

A. The information presented in Section 4.9.1 - Setting is inadequate to fully address the direct, indirect, and cumulative impacts of the proposed project and to evaluate whether the project is in compliance with existing Placer County policies. Specific examples include:

- The document describes field investigations conducted "intermittently from May 2000, during preparation of the background report, to July 2001." These field investigations included "general plant and wildlife surveys focusing on areas within the planning area with the potential to support special status species and sensitive habitats." However, none of these results are discussed. The information presented in Section 4.9.1, and in subsequent analyses, relies on existing information from the California Natural Diversity Data Base, U.S. Fish and Wildlife Service, and U.S. Forest Service. The referenced field investigations may or may not have been adequate in coverage or timing to

217-19

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

<p>detect special status species in the planning area. There is inadequate information presented in the DEIR to evaluate the adequacy of existing information as well as the surveys conducted specifically for the project. In addition, there is no discussion of the potential for various portions of the planning area to support sensitive species, high quality wildlife habitat, or unique assemblages of resources that may be especially important for protection.</p> <ul style="list-style-type: none">• The DEIR does not discuss or identify locations of existing protected areas in the region, locations of old growth forest stands, relevant fire history information, or areas of existing disturbance, which may affect where development and, conversely, habitat conservation should be planned. The descriptions in <i>Section 4.9.1</i> should be broadened to include information from the region surrounding the Martis Valley Community Planning area, to provide the appropriate context for resource and development planning.	<p>217-19 Cont'd</p>
<p>B. The impact analysis is inadequate and misleading. Specific examples include:</p> <ul style="list-style-type: none">• The impact analysis is circular. Development impacts that conflict with existing County policies are identified as potentially significant, but deemed mitigated by existing County policies, with no discussion of the inconsistency. There is no clear demonstration of how mitigation of specific impacts to specific resources will be achieved by the application of these policies. Therefore, the potential success of the suggested mitigation measures is difficult to assess. In addition, given that funding for mitigation measures will be derived largely from development fees, analyses should be conducted to determine the level of funding necessary to fully mitigate potential future impacts.	<p>217-20</p>
<ul style="list-style-type: none">• The biological impacts analysis should evaluate specific resources in both a local and a regional context. There is no “big picture” evaluation of how the resources relate to one another and the relative value of vegetation communities and wildlife habitat in or adjacent to the planning area. For example, the National Forest lands that surround the community planning area support resources that may also depend on habitats in the Martis Valley area. Furthermore, there is no discussion of the ecological processes that maintain these resources (e.g., migrations or other movements of species, fire cycles, natural hydrologic regimes, etc.) and how the proposed project might affect these processes.	<p>217-21</p>
<ul style="list-style-type: none">• There is minimal description and no analysis of unlisted wildlife species. According to the DEIR, standards of significance should include “substantial impacts to significant ecological resources including high quality and/or unique vegetation communities and wildlife habitats.” High quality and unique wildlife habitats are critical to sustaining plant and animal resources, and their importance is referenced in the County GP policies (e.g., Policy	<p>217-22</p>

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

6.C.1). These habitats should be identified, and potential impacts to these resources should be analyzed in the DEIR.	217-22 Cont'd
<ul style="list-style-type: none">• The manner in which the direct impact acreages are calculated and presented is inappropriate, confusing, and misleading. Impacts of potential timber production are not evaluated in the Biological Resources section of the DEIR. The DEIR states "forest parcels are considered separate impacts from those caused by implementation of the Martis Valley Community Plan." This is an inappropriate approach, given that changes to the extent of forest designations in the planning area are proposed as part of the project. Figures 4.9-6 through 4.9-9 show tabulations of the acreages of open space, forest, and development associated with each alternative. However, some development and associated infrastructure is allowed in forest parcels, and disturbance from outdoor recreation (e.g., ski runs) is allowed in open space parcels. Areas zoned for Timber Production should be identified, and the implications of this zoning should be discussed in more detail. Furthermore, there likely will be roads and other infrastructure in areas designated as open space. Thus, the total acreage in the development category is an underestimate of the direct impacts to biological resources in the planning area.	217-23
<ul style="list-style-type: none">• The discussion of indirect impacts, which in many instances can be more extensive than the direct impacts of development, is extremely weak. Indirect impacts can extend a large distance outside of the planning area. Indirect impacts that should be addressed include air quality changes (e.g., increased nitrogen deposition), hydrologic changes (e.g., runoff from development), water quality changes (e.g., fertilizer runoff from golf courses), increased light, increased noise, increased potential for increased abundance of non-native species, elevated road mortality, changes in fire regimes, and increased human presence. The overall sustainability of the level and type of proposed development in this area, which is valued for its aesthetic, recreational, and natural resources qualities, should be evaluated with these potential impacts in mind.	217-24
<ul style="list-style-type: none">• Various categories of open space should be clearly defined. It is not clear from the proposed Land Use diagram whether the open space is proposed to remain in a natural condition or will be recreational open space consisting of golf courses and ski runs.	217-25
<p>C. The analysis does not address the consistency of the proposed project and alternatives with the Placer Legacy Program and relevant Natural Community Conservation Planning (NCCP) Act guidelines. The cumulative impacts of the proposed project and alternatives on vegetation communities, wildlife and their habitats, special status species, habitat linkages and wildlife movement corridors, and other sensitive ecological resources are not adequately discussed or analyzed in the context of the goals of the Placer Legacy Program. Areas of eastern Placer County that are of particularly high integrity, long-term</p>	217-26
Conservation Biology Institute	6

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

<p>conservation value, or are otherwise unique and valuable, both within and adjacent to the planning area, should be identified in the DEIR, as specified in the County's NCCP Agreement. Development should be encouraged in lower value resource areas and discouraged in higher value resource areas. This lack of analysis potentially threatens the success of conservation planning efforts in Placer County.</p>	<p>217-26 Cont'd</p>
<p>D. Identified impacts are not adequately mitigated. The DEIR either relies on existing County policies to mitigate potential impacts or proposes inadequate and/or inappropriate mitigation measures. Reliance on existing County policies is not specific enough for the reader to determine if full mitigation of impacts is feasible and if all of the potentially significant impacts of the proposed Land Use diagram would be fully mitigated. In addition, several suggested mitigation measures are inadequate or inappropriate. For example:</p>	<p>217-27</p>
<ul style="list-style-type: none"> • The DEIR suggests that raptor nesting sites and bat roosts can be removed or blocked once nesting has been completed or the animals leave the roost, respectively. These mitigation measures are inappropriate -- nesting/roosting habitat may be limiting, and loss of these resources may result in the long-term decline of these species in the area. 	<p>217-28</p>
<ul style="list-style-type: none"> • Mitigation measures for potential impacts to mountain yellow-legged frogs must consider a broader area than just stream crossings. Chemicals in runoff from developments and associated recreational areas within the watershed of occupied stream systems must be controlled at their source to prevent these land uses from degrading water quality. These impacts will be difficult to mitigate if developments adjacent to potential mountain yellow-legged frog habitat are allowed to proceed. Comprehensive surveys for this species should be conducted to inform the MVCP update and allow an appropriate mitigation plan (including project design features) to be developed at this stage of the planning process. 	<p>217-29</p>
<ul style="list-style-type: none"> • Mitigation measures for potential impacts to Lahontan cutthroat trout consist of prohibiting construction in spawning habitat during the spawning season and prohibiting structures that would block fish passage. These measures ignore the potential for the residential developments and golf courses to degrade water quality and habitat quality for this species. A comprehensive mitigation plan must be developed during the MVCP update process that addresses all aspects of the habitat and life history requirements of Lahontan cutthroat trout and other salmonid species. 	<p>217-30</p>
<ul style="list-style-type: none"> • Mitigation measures for potentially significant impacts to wildlife movement consist of project-level deer surveys to determine the amount of natural open space necessary to maintain the known deer movement corridors. These surveys should either be conducted now, with an appropriate land use plan developed based on the results of these surveys, or, alternatively, the proposed 	<p>217-31</p>
<p>Conservation Biology Institute</p>	<p>7</p>

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Land Use diagram should be modified to increase the amount of natural open space in the vicinity of the known wildlife corridors. In the face of uncertainties due to a lack of information, the proposed Land Use diagram should be more conservative to minimize potential risks to natural resources.

217-31
Cont'd

E. Additional impacts should be considered.

- Connections between fawning areas and overwintering areas outside of the valley are largely eliminated by both the existing and proposed plans. What is the implication of this impact to the long-term productivity and persistence of the Loyalton Truckee deer herds?

217-32

- The DEIR does not address the incremental reduction in the potential for recovery of special status species, such as the Lahontan cutthroat trout and wolverine. The fragmentation and loss of important watershed habitat for the Martis Creek system would greatly reduce the potential for recovery of these species in the planning area.

217-33

- The DEIR does not address the direct, indirect, and cumulative impacts to old growth stands in and adjacent to the community planning area. The DEIR should examine the function of these habitats relative to other old growth stands in the region.

217-34

- The DEIR does not address the cumulative impacts of increased development and increased recreation on the surrounding National Forest lands, the Tahoe Basin, and the ecoregion.

217-35

3. Recommendations

- A. Revise and expand the discussion in the Biological Setting section to identify natural areas that are particularly unique, sensitive, or are otherwise of high quality. Conversely, identify natural areas that are disturbed, degraded or exhibit lower quality. Sound planning principles would target these latter areas for development (e.g., disturbed areas around existing Northstar ski runs or degraded areas adjacent to existing roads and developments) and cluster new development around existing development and infrastructure.

217-36

- B. Revise and expand the impact analysis. The impact analysis must include an analysis of impacts to biological resources in areas identified as Forest land use. The indirect effects of the proposed project, both within and outside of the Martis Valley Community Planning area, must be analyzed in greater detail. Indirect impacts are often more extensive than the direct impacts of the development footprint, and their implications to the long-term persistence of high quality natural resources in the Martis Valley are profound.

217-37

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

C. Eliminate suggested mitigation measures that do not consider the entire life cycle of a particular species, all of the habitat elements that the species requires, and whether or not some of these elements may be limiting to the species. For example, proposed mitigation measures for bats and the Lahontan cutthroat trout are not adequate.

217-38

D. Develop a conservation-based Land Use alternative that strives to maintain natural resource values and habitat integrity in accordance with County GP policies. The alternative should consider natural resources and ecological processes both within and surrounding the Martis Valley Community Planning area to insure that broad-scale habitat functions and connectivity are maintained. The following analyses could support the development of this alternative:

- Evaluate the rarity of the Martis Valley vegetation communities within a larger ecological region. Ensure that the habitats conserved as open space are representative of those in the larger region.
- Evaluate the diversity of vegetation communities and other resources in the context of the Sierra Nevada Ecosystem Project (SNEP). While any specific resource or community, in and of itself, may not be particularly unique from a regional perspective, the juxtaposition of these resources can be highly significant. Also, examine other biogeographic patterns, relating to physical factors such as climate, geologic history, or soils, that may make particular areas unique and of high value.
- Ensure that areas of high quality open space are interconnected, both within and outside of the Martis Valley Community Planning area. Maintaining large-scale habitat connectivity is critical to successful planning.

217-39

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 217: **MICHAEL D. WHITE, PH.D. AND JERRE ANN STALLCUP, M.A., CONSERVATION BIOLOGY INSTITUTE**

Response 217-1: Comment noted. Since no comments regarding the adequacy of the Draft EIR were received, no further response is required.

Response 217-2: The commentor's statements regarding the Martis Valley Community Plan are noted and will be forwarded to the Placer County Planning Commission and Board of Supervisors as part of project consideration. The environmental effects of the Martis Valley Community Plan and the associated Proposed Land Use Diagram and the alternative land use maps considered are fully addressed in the Draft EIR and Revised Draft EIR.

Response 217-3: The commentor's statements regarding the Martis Valley Community Plan are noted and will be forwarded to the Placer County Planning Commission and Board of Supervisors as part of project consideration. The environmental effects of the Martis Valley Community Plan and the associated Proposed Land Use Diagram and the alternative land use maps considered are fully addressed in the Draft EIR and Revised Draft EIR. The commentor is also referred to Master Response 3.4.3 (Water Quality) and Response to Comment K-6.

Response 217-4: The commentor's statements regarding the Martis Valley Community Plan are noted and will be forwarded to the Placer County Planning Commission and Board of Supervisors as part of project consideration. The environmental effects of the Martis Valley Community Plan and the associated Proposed Land Use Diagram and the alternative land use maps considered are fully addressed in the Draft EIR and Revised Draft EIR. Biological resource impacts associated with the project are addressed in Section 4.9 (Biological Resources) of the Draft EIR.

Response 217-5: The commentor's statements regarding the Martis Valley Community Plan are noted and will be forwarded to the Placer County Planning Commission and Board of Supervisors as part of project consideration. The environmental effects of the Martis Valley Community Plan and the associated Proposed Land Use Diagram and the alternative land use maps considered are fully addressed in the Draft EIR and Revised Draft EIR. Biological resource impacts associated with the project are addressed in Section 4.9 (Biological Resources) of the Draft EIR.

Response 217-6: The commentor's statements regarding the Martis Valley Community Plan are noted and will be forwarded to the Placer County Planning Commission and Board of Supervisors as part of project consideration. The environmental effects of the Martis Valley Community Plan and the associated Proposed Land Use Diagram and the alternative land use maps considered are fully addressed in the Draft EIR and Revised Draft EIR. Biological resource impacts associated with the project are addressed in Section 4.9 (Biological Resources) of the Draft EIR. The commentor is also referred to Response to Comment K-39.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Response 217-7: The commentor's statements regarding the Martis Valley Community Plan are noted and will be forwarded to the Placer County Planning Commission and Board of Supervisors as part of project consideration. The environmental effects of the Martis Valley Community Plan and the associated Proposed Land Use Diagram and the alternative land use maps considered are fully addressed in the Draft EIR and Revised Draft EIR. Biological resource impacts associated with the project are addressed in Section 4.9 (Biological Resources) of the Draft EIR.

Response 217-8: The commentor's statements regarding the Martis Valley Community Plan are noted and will be forwarded to the Placer County Planning Commission and Board of Supervisors as part of project consideration. The environmental effects of the Martis Valley Community Plan and the associated Proposed Land Use Diagram and the alternative land use maps considered are fully addressed in the Draft EIR and Revised Draft EIR. The commentor is also referred to Response to Comment K-39.

Response 217-9: The commentor's statements regarding the Martis Valley Community Plan are noted and will be forwarded to the Placer County Planning Commission and Board of Supervisors as part of project consideration. The environmental effects of the Martis Valley Community Plan and the associated Proposed Land Use Diagram and the alternative land use maps considered are fully addressed in the Draft EIR and Revised Draft EIR. Biological resource impacts associated with the project are addressed in Section 4.9 (Biological Resources) of the Draft EIR.

Response 217-10: The commentor's statements regarding the Martis Valley Community Plan are noted and will be forwarded to the Placer County Planning Commission and Board of Supervisors as part of project consideration. The environmental effects of the Martis Valley Community Plan and the associated Proposed Land Use Diagram and the alternative land use maps considered are fully addressed in the Draft EIR and Revised Draft EIR. Biological resource impacts associated with the project are addressed in Section 4.9 (Biological Resources) of the Draft EIR. The commentor is also referred to Response to Comment F-12, K-39 and 10-28.

Response 217-11: The commentor's statements regarding the Martis Valley Community Plan are noted and will be forwarded to the Placer County Planning Commission and Board of Supervisors as part of project consideration. The environmental effects of the Martis Valley Community Plan and the associated Proposed Land Use Diagram and the alternative land use maps considered are fully addressed in the Draft EIR and Revised Draft EIR. Biological resource impacts associated with the project are addressed in Section 4.9 (Biological Resources) of the Draft EIR.

Response 217-12: The commentor's statements regarding the Martis Valley Community Plan are noted and will be forwarded to the Placer County Planning Commission and Board of Supervisors as part of project consideration. The environmental effects of the Martis Valley Community Plan and the associated Proposed Land Use Diagram and the alternative land use maps

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

considered are fully addressed in the Draft EIR and Revised Draft EIR. Impacts to biological resources in the Plan area are addressed in Section 4.9 (Biological Resources) of the Draft EIR. The commentor is referred to Master Response 3.4.3 (Water Quality) and 3.4.4 (Water Supply Effects of the Project).

Response 217-13: The commentor's statements regarding the Martis Valley Community Plan are noted and will be forwarded to the Placer County Planning Commission and Board of Supervisors as part of project consideration. The environmental effects of the Martis Valley Community Plan and the associated Proposed Land Use Diagram and the alternative land use maps considered are fully addressed in the Draft EIR and Revised Draft EIR. Biological resource impacts associated with the project are addressed in Section 4.9 (Biological Resources) of the Draft EIR.

Response 217-14: The commentor's statements regarding the Martis Valley Community Plan are noted and will be forwarded to the Placer County Planning Commission and Board of Supervisors as part of project consideration. The environmental effects of the Martis Valley Community Plan and the associated Proposed Land Use Diagram and the alternative land use maps considered are fully addressed in the Draft EIR and Revised Draft EIR. The commentor is referred to Master Response 3.4.3 (Water Quality).

Response 217-15: The commentor's statements regarding the Martis Valley Community Plan are noted and will be forwarded to the Placer County Planning Commission and Board of Supervisors as part of project consideration. The environmental effects of the Martis Valley Community Plan and the associated Proposed Land Use Diagram and the alternative land use maps considered are fully addressed in the Draft EIR and Revised Draft EIR. Biological resource impacts associated with the project are addressed in Section 4.9 (Biological Resources) of the Draft EIR.

Response 217-16: The commentor's statements regarding the Martis Valley Community Plan are noted and will be forwarded to the Placer County Planning Commission and Board of Supervisors as part of project consideration. The environmental effects of the Martis Valley Community Plan and the associated Proposed Land Use Diagram and the alternative land use maps considered are fully addressed in the Draft EIR and Revised Draft EIR.

Response 217-17: The commentor's statements regarding the Martis Valley Community Plan are noted and will be forwarded to the Placer County Planning Commission and Board of Supervisors as part of project consideration. The environmental effects of the Martis Valley Community Plan and the associated Proposed Land Use Diagram and the alternative land use maps considered are fully addressed in the Draft EIR and Revised Draft EIR. Biological resource impacts associated with the project are addressed in Section 4.9 (Biological Resources) of the Draft EIR.

Response 217-18: Comment noted. The County considers the biological resources impact analysis provided in Section 4.9 (Biological Resources) of the Draft EIR

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

adequate for consideration of the Martis Valley Community Plan and in compliance with CEQA.

Response 217-19: The commentor suggests that the biological resources analysis in the Draft EIR is inadequate and does not fully address the project's direct, indirect and cumulative impacts. Section 4.9 (Biological Resources) of the Draft EIR utilizes several sources of information and studies, biological resource evaluations for individual properties within the Plan area as well as detailed vegetative and habitat mapping. This section also notes applicable local, state and federal policies and regulations associated with biological resources. Thus, Section 4.9 of the Draft EIR is consistent with the setting requirements of CEQA Guidelines 15125. The commentor is referred to Master Response 3.4.1 (Project Description Adequacy) and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR).

Section 4.9 (Biological Resources) of the Draft EIR provides an extensive discussion of existing biological conditions within the Plan area, including detailed habitat mapping. Reports and surveys used in the analysis were specifically cited in the references portion of the Section (Draft EIR pages 4.9-90 and -91). Each of these reference materials provided appropriate information for the description of biological resources in the Plan area as well as consideration of project impacts. The locations of known occurrences of special-status plant and animal species as well as deer migration through the Plan area are specifically noted in the Draft EIR (Draft EIR pages 4.9-24 through -33).

The Draft EIR provides detailed mapping and resource information for the Plan area and connection with surrounding areas associated with current areas of substantial disturbance in the Plan area and wildlife movement through the Plan area (Figure 4.9-5 of the Draft EIR), habitat and vegetation conditions (including forested areas, Figures 4.9-1 and 4.9-2 of the Draft EIR) and waterways/wetland areas (Figure 4.9-4 of the Draft EIR). Disturbance in the region (i.e., Sierra Nevada Range), due to logging, residential and commercial development, and fire suppression has occurred for decades. Additionally, much of the area (e.g., developed areas within the Plan area, Town of Truckee and Tahoe Basin) is already developed and/or disturbed. Given the history of disturbance and the level and/or proximity to existing development, it is not anticipated that the project will significantly change fire regimes.

Response 217-20: Proposed Martis Valley Community Plan policies, implementation programs and mitigation measures identified in the Draft EIR consist of performance standards that subsequent development within the Plan area would be required to comply with, consistent with type of project under evaluation (adoption of a new community plan). The use of performance standard mitigation is allowed under CEQA Guidelines 15126.4(a) and is supported by case law (*Sacramento Old City Association v. City Council of Sacramento* [3d. Dist. 1991] 229 Cal.App.3d 1011, 1028 [280 Cal.Rptr. 478]).

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Response 217-21: The Draft EIR addresses biological resource impacts associated with special-status species that are not limited to the Plan area, including wildlife movement and deer migration (Draft EIR pages 4.9-39 through –89). In addition, the Draft EIR considers the cumulative effect of the proposed Martis Valley Community Plan on biological resources in the region (Draft EIR pages 4.9-88 and –89).

Response 217-22: Impacts to common species are considered less-than-significant unless the proposed project has the potential to affect a common species throughout a large portion of its known range (i.e., threatens to eliminate the species), has potential to cause populations of common species to fall below self-sustaining levels, or the proposed project has the potential to affect the movement of the common species from one seasonal range to another. Draft EIR pages 4.9-39 and –40 identifies that the vegetation and habitat types to be impacted by the project (mixed conifer forest, red fir forest, Great Basin sage scrub, montane chaparral, and ruderal habitats) are widespread throughout the Sierra Nevada and currently receive no protection from federal, state, or local resource agencies. Thus, their conversion as a result of subsequent development in the Plan area would not be considered significant. However, the Draft EIR does acknowledge where conversion of such habitats may impact special-status species and deer migration (Draft EIR pages 4.9-51 through –87).

Response 217-23: The commentor suggests that the Draft EIR did not consider all environmental effects and extent of habitat loss from the adoption Martis Valley Community Plan associated with roadway widening, new golf course development, ski terrain expansion, timber harvesting and other allowed land uses. Draft EIR page 4.9-39 specifically notes that the vegetation impact acreage estimates are based on the direct impacts from substantial development set forth under the land use map options. However, the Draft EIR also considers that biological resource impacts associated with roadway widening, new golf course development, ski terrain expansion, timber harvesting and other allowed land uses (Draft EIR pages 4.9-39 through –89). The commentor misstates the Draft EIR that the use of forest parcels is not considered in the impact analysis. The intent of the statement on Draft EIR page 4.9-39 was to specifically note that the proposed Martis Valley Community Plan does not specifically propose timber production in the Plan area, rather it acknowledges and regulates this allowed land use.

Response 217-24: The impact analysis associated with Section 4.9 (Biological Resources) of the Draft EIR specifically acknowledges increased human presence as an indirect effect on biological resources in the Plan area, which includes such aspects of increased human presence as water quality concerns and the expansion of roadway facilities (Draft EIR pages 4.9-51 through –89).

Response 217-25: The impact analysis provided in Section 4.9 (Biological Resources) of the Draft EIR specifically acknowledges that some land areas designated as Open Space or another low intensity land use may be impacted by recreational development associated with new golf courses and ski terrain

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

expansions that are not specifically a component of the Martis Valley Community Plan (Draft EIR pages 4.9-39 through -89).

Response 217-26: The commenter is referred to Master Responses 3.4.1 (Project Description Adequacy) associated with Placer Legacy and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR). Section 4.9 (Biological Resources) of the Draft EIR analyzes the biological resource impacts associated with the Proposed Land Use Diagram.

Response 217-27: The commentor states that the Draft EIR lacks evidence that the identified mitigation measures and proposed policies would mitigate project impacts and fails to identify other feasible mitigation measures. However, the commentor does not provide any specifics in regards to what Draft EIR mitigation measures are of concern. As identified in several sections of the Draft EIR, the mitigation measures identified the Draft EIR are based on consultations with applicable public agencies, recommendations from technical studies and reports that are referenced in the Draft EIR, evidence referenced in this document, applicable agency standards and the expert opinion of qualified professionals associated with the preparation of the Draft EIR.

Response 217-28: Raptors and migratory birds have varying levels of tolerance regarding human presence. It should be noted that the Plan area is already disturbed and includes substantial human presence. Mitigation Measure MM 4.9.6 would ensure that no birds or their active nests are disturbed during construction activities. The project would involve minor reductions to total available nesting habitat in the region and thus, no significant indirect impacts to raptors and migratory birds are expected. The commenter refers to Mitigation Measure 4.9.6 that does not suggest that roosts can be removed once nesting is completed. The mitigation measure states "Trees containing nest sites ***that must be removed*** shall be removed during the non-breeding season." *Emphasis added. Draft EIR page 4.9-67.* The Mitigation Measure also requires compliance with the Endangered Species Act and concurrence by the California Department of Fish and Game and the United States Fish and Wildlife Service to ensure no "take" of habitat occurs.

Response 217-29: Comment noted. The Martis Valley Community Plan already includes several policies that would preserve habitat conditions for the mountain yellow-legged frog associated with protecting waterways in the Plan area from development and the inclusion of buffers, in addition to Mitigation Measure MM 4.9.4. The commentor is referred to Master Response 3.4.3 (Water Quality).

Response 217-30: The commentor is referred to Master Response 3.4.3 (Water Quality) and Response to Comment K-39 and 10-28.

Response 217-31: Comment noted. The Proposed Land Use Diagram provides land uses that generally maintain existing wildlife movement corridors as well as deer migration routes. Biological resource evaluations cited in Section 4.9 (Biological Resources) of the Draft EIR provide detailed information

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

regarding the movement of deer through the northwestern and western portion of the Plan area. Mitigation measures MM 4.9.11a and b specifically ensure that subsequent development projects identify the specific path of deer migration and provide adequate and appropriate open space corridors to allow continued use of the corridors.

Response 217-32: The Draft EIR specifically addresses potential impacts to deer migration (Draft EIR pages 4.9-81 through -87). Implementation of proposed Martis Valley Community Plan policies and mitigation measures MM 4.9.11a and b would mitigate this impact to less than significant. The commentor provides no evidence that counters the conclusions in the Draft EIR.

Response 217-33: The commenter is referred to Response to Comment K-39 regarding the Lahontan cutthroat trout. The Draft EIR does address potential impacts to the California wolverine (Draft EIR pages 4.9-72 through -76). However, the Draft EIR does acknowledge that the project would contribute to cumulative impacts on special-status species and habitat conditions in the region (Draft EIR pages 4.9-88 and -89).

Response 217-34: The commentor is referred to Response to Comment 217-33. The project is not expected to result in any direct loss in old growth stands adjacent to the Plan area. The commentor provides no evidence to support to statement that the project would result in direct off-site old growth stand impacts.

Response 217-35: The commentor is referred to Response to Comment 217-33 and Master Response 3.4.6 (Consideration of Impacts to the Tahoe Basin).

Response 217-36: Comment noted. Placer County believes that the biological resources analysis in the Draft EIR is adequate for consideration of the Martis Valley Community Plan and in compliance with CEQA. The Revised Draft EIR analyzed several alternatives that would reduce biological resource impacts associated with reduced development in the Plan area.

Response 217-37: The commentor is referred to Response to Comments 217-19 through 217-35.

Response 217-38: Comment noted. The commentor is referred to Response to Comment K-39 and 14-18.

Response 217-39: The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis).

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 218

PLACER COUNTY
DATE
RECEIVED

132 Belcrest Drive
Los Gatos, CA 95032
August 14, 2002

AUG 19 2002

PLANNING DEPARTMENT

Attn.: Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 "B" Avenue
Auburn, CA 95603

Re: Draft Environmental Impact Report (DEIR) for the proposed Martis Valley
Community Plan (MVCP) Update

Dear Ms. Lawrence :

This letter concerns the fact that you have not addressed the issues concerning the American Black Bear (*Ursus Americanus*), Cony (*Ochotona princeps*), Yellow-bellied Marmot (*Marmota flaviventris*), Mountain Coyote (*Canis latrans*), Lemming Mouse (*Phenacomys intermedius*), and Mule Deer (*Odocoileus hemionus*). What do you propose to do about these animals? Why were they left out of your report? There are many more plants, animals, insects, that also need to be addressed.

218-1

It appears that this report does not clearly research the amount of land required for each of these individual species to live and prosper. The ecosphere in which these animals reside is very fragile and depends upon the plants, and natural resources that naturally occur within the Martis Valley. Dissecting this valley into communities of people will greatly endanger not just one but all of the naturally occurring ecosystems of the Valley, which in turn helps support the Tahoe National Forest's naturally occurring species and multitude of ecosystems. What amount of land will be undisturbed in this specific area for animal use only and what do you plan to do with the displaced wildlife, i.e. fish, birds, mammals, reptiles, amphibians and plant life? What do you plan to do to replace or substitute this natural habitat for this specific ecosystem?

218-2

The research behind these species is not my responsibility, but yours in promoting this project. Clarification is needed to propose how these species of interlinked animals will survive upon developments of houses, roads, golf courses, swimming pools and the pollution that these human structures bring with them to the environment around them. A golf course cannot be considered open space, because of the unnatural occurrence of fencing, seeding, fertilizing, watering maintenance and such that is needed to provide its golf 'usefulness'. An animal, such as a bear or beaver, will not be welcomed to burrow through the greens, or romp on the area as they would be granted in their natural habitat (such as a land preserve.)

218-3

¹ Not man made watering holes, and dumpsters in which the animals find waste materials to investigate and get either dependent upon or become sick or injured because of the items unnatural occurrence and content.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

What is your proposed cap on development? How many residences make up your limit? Have you considered the amount of other things necessary in supporting a community of this size? Banks, grocery, service stations, road maintenance (including personal snow plow services), increased police force, tow trucks, and other necessities to support a community this size. Have you considered the increase on smog from chimneys alone, or the water resources or power required for this project and the continued taxing effect that each one of these 'necessities' has on the environment.

218-4

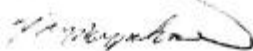
None of these proposed plans or alternatives have a minimal impact on the environment, they are all quoted as having a significant impact. What do you suggest as a more ecologically minded alternative to your plans?

218-5

Thank you for your time, I hope that in future some of these concerns and questions of mine can be answered in a suitable ecological and timely manner. Remember we do not inherit the Earth from our parents but borrow it from our children.

218-6

Sincerely,



Katherine Moynahan

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 218: KATHERINE MOYNAHAN, RESIDENT

- Response 218-1:* The commentor is referred to Response to Comments F-9, F-11 and 153-1. The commentor is also referred to pages 4.9-2 through -9 in Section 4.9 (Biological Resources) of the Draft EIR for a list of habitat types and wildlife species in the Plan area. The commentor will notice that both the American black bear and the Mule Deer are described under the "Biological Communities" setting. The species that the commentor has listed are all considered common wildlife. The cony, also known as a pika or "rock rabbit", (*Ochotona princeps*) is a common species that lives at the base of cliffs near rock piles. The yellow-bellied marmot (*Marmota flaviventris*) is a common rodent that lives in meadows and valleys in open areas that are free of trees and shrubs. The Mountain coyote (*Canis latrans*) is a common species that lives in a variety of habitats ranging from open prairies to forests. The Lemming mouse, also known as the heather vole, (*Phenacomys intermedius*) is a common rodent that is found throughout the Sierra Nevada Mountains. It should be noted that the common species mentioned on pages 4.9-2 through -9 are representative of the common wildlife species in the Plan area and is not an exhaustive list. The commentor is referred to pages 4.9-41 through -51 for a discussion of impacts to bears and other common wildlife.
- Response 218-2:* The commentor is referred to Response to Comment F-14.
- Response 218-3:* The commentor is referred to Response to Comment 218-1. Regarding the consideration of golf courses as open space, the Placer County General Plan allows recreational uses in their Open Space Land Designation.
- Response 218-4:* The commentor is referred to Master Responses 3.4.2 (Assumptions Used for Development Conditions in the Plan Area) and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR).
- Response 218-5:* The commentor is referred to Master Responses 3.4.5 (Adequacy of the Alternatives Analysis).
- Response 218-6:* Comment noted. The commentor does not comment on the adequacy of the Draft EIR. Therefore, no further response is necessary.

Letter 219

August 14, 2002

PLACER COUNTY
DATE
RECEIVED

AUG 19 2002

PLANNING DEPARTMENT

Lori Lawrence
Environmental Review Technician
Placer County Planning Dept.
11414 B Avenue
Auburn CA 95603

Re: DEIR for the Proposed Martis
Valley Community Plan Update, SH No 2001072050

Dear Ms. Lawrence:

I am particularly interested in water quality because the valley's water resources are a fundamental source of natural beauty and vital to the area's wildlife and plant life. Therefore, I am concerned that the DEIR inadequately addresses the potential impact of proposed development.

219-1

The DEIR states on page 4.7-28 that impacts to water quality would be less than significant because of proposed policies, implementation programs and mitigation measures in the MCVP. However, some of these protective measures are inadequate because of weak language or lack of quantifiable standards.

<p>219-2</p>	<p style="text-align: right;">2</p> <p>Policy G.E.6 states that the "County shall improve water quality of runoff from ... development through use of ... mitigation measures.... However, no means to quantify the improvement of runoff water quality are given. Please provide the appropriate standards, in quantifiable terms, for runoff to insure that the impact on water quality will be insignificant.</p>
<p>219-3</p>	<p>Policy 9.D.1 identifies minimum setbacks to be required from environmentally sensitive areas. However, no data is given to support the adequateness of these setbacks. Please provide documentation to support the effectiveness of the given minimums. Also, define what would trigger requirements for "substantially larger" buffers as described in the MVEP.</p>
<p>219-4</p>	<p>Policy 9.F.5. states that the County shall "discourage direct runoff of pollutants and siltation...." This is ambiguous and legally dubious language would not protect from runoff of pollutants or silts because it does not prohibit such incidents. The policy should state that the "County shall prohibit direct runoff of pollutants" Please reevaluate the true effect of unprohibited</p>

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

219-4
Cont'd

pollutants in runoff.

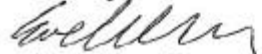
3.

219-5

Please re-evaluate the effectiveness of the county's policies and their ability to protect against significant cumulative impact by development on water quality in light of these examples of inadequate and legally unenforceable language.

Sincerely,

Eve Werner



15516 Donnington Lane (PO Box 108)
Truckee CA 96162

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 219: EVE WERNER, RESIDENT

Response 219-1: The commentor is referred to Master Responses 3.4.3 (Water Quality). The commentor provides no specifics in questioning the ability of the plan to protect water quality. Section 4.7 of the Draft EIR addresses water quality and establishes a number of policies designed to ensure continued water quality. In addition, Mitigation Measure 4.7.1b of the Draft EIR (page 4.7-36) requires that each project "...clearly identify specific water quality controls will ensure no net increase in sediment or other pollutant loads in waterways and that the storm water discharges are in compliance with all current requirements of the Lahonton Regional Water Quality Control Board." On page 4.7-53 of the Draft EIR, the Water Resources Implementation Programs also require that the County participate in a water quality with the Placer County Water Agency in preparation and implementation of a comprehensive surface and groundwater management program to ensure long-term protection and maintenance of surface and groundwater resources. These policies establish performance criteria of no net increase, and work to establish an "...inventory of water supply and quality information and demand estimates, using as much available information as possible, with the objective of creating an easily accessible, comprehensive and regularly updated database that can be shared by water management agencies;" Policy 12c Martis Valley Community Plan on page 4.7-53 of the Draft EIR.

Response 219-2: The commentor is referred to Response to Comment 219-1.

Response 219-3: Policies 9.D.1 and 9.D.4 of the Martis Valley Community Plan requires specific setbacks from all riparian zones, wetlands, old growth woodlands, and the habitat of rare, threatened or endangered species. Policy 9.D.1 also stipulates that in some instances the minimum setbacks may need to be substantially larger. Policy 9.D.4 requires public and private projects to address creeks and riparian corridors, including provisions for long-term creek corridor maintenance. The wildlife biologist will determine the need for additional setbacks in consultation with UFWS and CDF. Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.

Response 219-4: The commentor is referred to Master Responses 3.4.3 (Water Quality). Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.

Response 219-5: The commentor is referred to Response to Comment 219-4.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 220

PO Box 806
Kings Beach, CA 96143

8/14/2002

Lori Lawrence
Environmental Review Technician
Placer County Planning Dept.
11414 "B" Avenue
Auburn, CA 95603

PLACER COUNTY
DATE
RECEIVED

AUG 19 2002

PLANNING DEPARTMENT

Dear Lori Lawrence,

I have been following the Martis Valley plan for the last year and I am appalled at the direction the country is taking. I think the country cannot make a fair decision with the current EIR because it is lacking the decisive information that these reports should have to make informed and accurate decisions about land use. The EAST-WEST's companion bid to develop the Martis Valley is very scary for residents, and I am one of them. The valley is a natural treasure, and the current EIR leaves out the detail from the development plan that should be in the report. The current EIR leaves it wide open for interpretation, and thus can allow EAST-WEST to develop as they please because there are not enough details about their development plan. The EIR's purpose is to accurately define the development plan, and thus protect a natural resource. The current EIR just fails to be accurate and thus should be rewritten.

220-1

On an more emotional front, the Martis Valley is a natural treasure is the Truckee-Tahoe area. Unfortunately, one country is failing to realize this and is trying to capitalize on the dollar sign. Why ruin the area. 6800 homes and 140+ holes of golf are not going to make the Martis Valley and the Truckee-Tahoe a better place to live. I don't live in Tahoe Vista because I love crowds or golf. I live in this community because I enjoy the pristine mountains, the clean air, the crystal clean water, the friendly attitude of fellow residents. This development only brings second home owners that think little about the community. These people come for the weekend, take all that they can, and then leave, and usually they leave waste and trash, and smog with their SUVs. Do we really want or need this kind of growth? The Truckee-Tahoe area should grow, but at a controlled level. I grew up in a community in the bay area, Moraga, that always restricted growth, and the town is much better of because of it. Back in the 70's they wanted to build a freeway connecting highway 24 with highway 680. This freeway would have gone straight through the town. Thankfully, the community spoke up enough and combated this development. It would have ruined the quiet town of Moraga. This 6800 home development plan will ruin the Truckee-Tahoe area. It will not only bring an extreme amount of congestion, but it will also scare the landscape. For 27 years I've come up to Tahoe and driven across the Martis Valley, and for the last 5 I have been a resident. It still gives me a rush to drive across Martis Valley on 267 because it is one of the few barren stretches in the area where you can just gaze across the landscape and see nothing but wild. If we don't protect this area you'll only be gazing at the bumper in front of you, the stoplight at the new Raley's mart, and the tacky condo homes scattered about the valley floor. Think about Hetch Hetchy. That is one valley that we may never see again, because they didn't have EIR back in those days. We have them now, so let's

220-2

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

effectively use them. I plea to you to rewrite the current EIR with all the missing details from the Martis Valley development plan.

220-2
Cont'd

Sincerely,
John Puccini
Tahoe Vista
Resident



3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 220: **JOHN PUCCINI, TAHOE VISTA RESIDENT**

Response 220-1: The commentor states that the Martis Valley Community Plan and Draft EIR are lacking the decisive information for the County to make informed and accurate decisions about land use. The commentor fails to identify the inadequacy of the Draft EIR. The commentor is referred to Sections 4.1 through 4.12 that contain an extensive analysis of the environmental impacts associated with implementing the Martis Valley Community Plan. No further response is necessary.

Response 220-2: The commentor is referred to Response to Comment 220-1. Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 221

PLACER COUNTY
DATE
RECEIVED

Date: August 15, 2002

AUG 19 2002

Attn.: Lori Lawrence
Environmental Review Technician
Placer County Planning Dept.
11414 "B" Ave.
Auburn, Ca. 95603

PLANNING DEPARTMENT

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

Dear Ms. Lawrence:

221-1

OF COURSE, THE LARGEST CONCERN WITH 700 NEW HOMES IN MARTIS VALLEY IS THE IMPACT ON TRUCKEE TOWN STREETS. AS OF RIGHT NOW, TRAFFIC ON DOWNER PASS ROAD WITHIN TRUCKEE TOWN LIMITS IS TWICE WHAT IT WAS JUST 2 YEARS AGO. WITH THE TRAFFIC IMPACT FROM FROM THE INTRAWEST PROJECT AT SPAN VALLEY, AND THE TRAFFIC FROM THE MARTIS VALLEY GROWTH, EVEN SPENDING TOWN MONIES TO 4 LANE DOWNER PASS ROAD WILL NOT PREVENT GRIDLOCK IN THE FUTURE TOWN. I DO NOT FEEL THAT YOUR TRAFFIC STUDIES ARE ACCURATE OR BELIEVABLE. PLEASE HAVE YOUR CONSULTANTS RE-THINK THEIR REPORTS AFTER THE 267 BY PASS HAS BEEN OPEN & IN OPERATION THROUGH A WINTER ~ OR TWO. 2 CARS PER HOME (MINIMUM!) MEANS 14,000 MORE CARS!

221-2

I LIVE IN GLENSHIRE, TOWN OF TRUCKEE. GLENSHIRE WILL SOON BE DEPENDENT ON A VIAL BETWEEN GLENSHIRE DRIVE & THE RAILROAD LOCATED EAST OF TRUCKEE. WILL THE DRAWDOWN OF THE ACQUIFER TO SERVE 700 HOMES + A GOLF COURSE CAUSE GLENSHIRE TO NOT HAVE SUFFICIENT PURE WATER FOR DRINKING AND BATHING? WE IN GLENSHIRE DEMAND THAT THIS BE GIVEN TOP CONSIDERATION. HOW DO YOU DETERMINE HOW MUCH WATER THERE IS IN AN ACQUIFER? I DON'T BELIEVE THAT THIS IS SCIENTIFICALLY POSSIBLE! PLEASE DO NOT LET THE DEVELOPERS STEAL OUR WATER! THANK YOU VERY MUCH!

GEORGE ROBERTSON
Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

pg. 1

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 221: **GEORGE ROBERTSON, RESIDENT**

Response 221-1: The commentor is referred to Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis).

Response 221-2: The commentor is referred to Master Response 3.4.4 (Water Supply Effects of the Project) and Section 4.7 (Hydrology and Water Quality) of the Draft EIR.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Sent By: SANDBERG & LO DUCA;

916 774 1646;

Aug-19-02 4:21PM;

Page 2/5

Letter 222

SANDBERG & LO DUCA
ATTORNEYS AT LAW

MARCUS J. LO DUCA
CRAIG M. SANDBERG

3300 DOUGLAS BOULEVARD, SUITE 500
ROSBYVILLE, CA 95661
TEL (916) 774-1646
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RICHARD G. GLENN, OF COUNSEL

August 19, 2002

Ms. Lori Lawrence
Environmental Review Technician
County of Placer
Planning Department
11414 B Avenue
Auburn, CA 95603

Re: Martis Valley Community Plan Update ("MVCP Update") Draft
Environmental Impact Report ("DEIR") [State Clearinghouse
Number 2001072050]

Dear Ms. Lawrence:

On behalf of Sierra Pacific Industries ("SPI"), I appreciate the opportunity to submit these comments regarding the DEIR for the MVCP Update. The comments below are aimed primarily at supplementing the information already presented in the DEIR, or to suggest corrections to the text.

Our comments are as follows:

PROJECT DESCRIPTION/PROJECT OBJECTIVES

Page 3.0-8. The reference in the first paragraph to Figure 3.0-5 as the existing Martis Valley General Plan land use map should refer instead to Figure 3.0-6.

222-1

Page 3.0-11 (Table 3.0-1). Although SPI does not have an application on file with the County for the Martis Ranch property, urban land use for a portion of Martis Ranch is included in the Proposed Project. In addition, an even larger amount of acreage (approximately 1,000 acres) of SPI's property has had an urban land use designation for over 25 years, beginning with the 1975 Martis Valley General Plan. SPI has voluntarily agreed to the elimination of any urban land use for that portion of its property south of Highway 267. It may be helpful to readers to include a brief summary of the Martis Ranch project in this table for the 680 acre Martis Ranch project, creating a link to the analysis in the DEIR of the Proposed Project.

222-2

Pages 3.0-19, -20. Although the DEIR's project description includes a list of project objectives in the form of the goals of the MVCP Update, the project objectives can in their essence be boiled down to three overriding objectives:

222-3

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Sent By: SANDBERG & LO DUCA;

916 774 1846;

Aug-19-02 4:21PM;

Page 3/5

Ms. Lori Lawrence
August 19, 2002
Page 2

1. Bring the Martis Valley Community Plan, i.e., the Proposed Plan, into consistency with the 1994 Placer County General Plan, as required by State Planning and Zoning Law;
2. Adopt a set of policies to guide envisioned development in Martis Valley; and
3. Adopt a roadway improvement plan that accommodate the envisioned development of Martis Valley.

222-3
Cont'd

The Final EIR should acknowledge these objectives as they were set forth in the March 13, 1998 directive from the Placer County Board of Supervisors (set forth in the appendices to the DEIR as an attachment to SPT's comment letter on the Notice of Preparation), which also stated that:

"[t]he primary focus [of the Update] is not to be major changes in land use designations, as it has been recognized for some time by the County that such changes are not appropriate, and that the previous land use plan, with minor changes, is still current for this area..."

LAND USE

Page 4.1-3. Under the "Land Ownership" section, Sierra Pacific owns 7,972 acres, or 32 percent of the Placer County portion of Martis Valley.

222-4

Page 4.1-7. In the first paragraph of the Martis Valley General Plan section, it might be helpful to readers to reference the constraints exhibit in the Martis Valley General Plan.

222-5

Page 4.1-33. The second to last line of Policy 1.F.6 should refer to "residential-planned development", not "residential development reserve".

222-6

POPULATION/HOUSING/EMPLOYMENT

Page 4.2-2. The last sentence on the page should be deleted, as the General Plan already set forth a holding capacity of 80% of the maximum 1994 buildout capacity. (General Plan EIR, pages 1-32 through 1-43)

222-7

Page 4.2-3. At the end of the Holding Capacity section, the 680 acre Martis Ranch project should be referenced, as it has had urban land use designations since 1975 and is contained in the land use plans both of the 1975 Martis Valley General Plan and in the Proposed Project for the MVCP Update.

222-8

Page 4.2-25. With roughly 2,000 fewer residential units and 1,100 more jobs than the Proposed Project, it is difficult to see how Alternative 2 would even remotely be able to address housing needs for existing or future employees in Martis Valley, particularly as compared to either the Proposed Project or the existing Martis Valley General Plan.

222-9

TRANSPORTATION/CIRCULATION

Page 4.4-27. The section on standards of significance erroneously includes references to Section 4.1.2. The correct reference is to Section 4.4.2.

222-10

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Sent By: SANDBERG & L.O. DUCA;

916 774 1646;

Aug-19-02 4:22PM;

Page 4/5

Ms. Lori Lawrence
August 19, 2002
Page 3

Page 4.4-36, -37 (Table 4.4-14). The text should note that the Proposed Project has less than 9 percent more daily trips than Alternative 2, 23 percent fewer daily trips than the existing Martis Valley General Plan, and 12 percent fewer daily trips than Alternative 1. In addition, the Proposed Project's p.m. peak hours trips are less than 10 greater than Alternative 2, with Alternative 1 having over 12 percent more p.m. peak trips than the Proposed Project, which also has 25 percent fewer p.m. peak trips than the existing Martis Valley General Plan.

222-11

Page 4.4-62 (Table 4.4-30). Compared to the Proposed Project, Alternative 2 would have (1) more average daily trips along the Northstar Connector with just the Northstar Connection being built; and (2) more average daily trips than the Proposed Project along the Northstar Connector, and basically the same trips of trips along the Palisades Connector, as the Proposed Project, with both the Northstar Connection and Palisades Connection built. Thus, the DEIR's conclusion of "less severe traffic impacts to local residential streets for Alternative 2 compared to the Proposed Project" should be corrected, as Alternative 2 has greater traffic impacts than the Proposed Project for 2 of the 3 roadway connection alternatives shown in Table 4.4-30.

222-12

Page 4.4-39 through 4.4-73. In the FEIR's discussion of roadway impacts, the document should include a discussion of a roadway segment between SPI's Martis Ranch and the Waddell Ranch property, which connection would eliminate the need to widen SR 267 from 2 to 4 from Northstar's entrance south along State Route 267. With this improvement, any concern over the widening State Route 267 south of the Northstar entrance, the elimination of which only exists with the inclusion of the Martis Ranch and Waddell Ranch projects, as found in the Proposed Plan, but not in Alternatives AB and AC, and not in the Clustered Alternative or Reduced Intensity Alternative, would be completely addressed.

222-13

AIR QUALITY

Page 4.6-7 (Table 4.6-2). Alternative 2 will have greater construction emissions before and after mitigation than the Proposed Project for ROG, NOx and PM10. Alternative 1 also has far greater construction emissions than the Proposed Project.

222-14

Page 4.6-8 (Table 4.6-3). Both Alternative 1 and Alternative 2 will generate higher levels of carbon monoxide than the Proposed Project.

222-15

Page 4.6-13, -14 (Table 4.6-4). Alternatives 1 and 2 will have greater air quality impacts for ROG, NOx and PM10, for both direct and indirect impacts, than the Proposed Project.

222-16

PUBLIC SERVICES

Pages 4.11-9, -10. The last sentence under both the discussion for Alternatives 1 and 2 should be revised to delete any reference to ski-based/tourism uses on SPI's property, as a ski resort is no longer proposed by SPI.

222-17

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Sent By: SANDBERG & LO DUCA;

918 774 1646;

Aug-19-02 4:22PM;

Page 5/5

Ms. Lori Lawrence
August 19, 2002
Page 4

ALTERNATIVE ANALYSIS

General Comment. In Section 6.0 of the Draft EIR, only one of the three alternatives selected, the No Project Alternative, exactly matches an alternative studied at length in the rest of the Draft EIR, Alternative Land Use Map AA. The other two alternatives discussed in Section 6 do not precisely correspond to Alternative Land Use Maps AB and AC, though they do approximate the development levels in the Land Use Map alternatives. Moreover, as noted above, the Board of Supervisors directed that significant changes to approved land uses from the existing Martis Valley General Plan should not be considered. That rationale should be stated in the text of the Final EIR (As an aside, we would note that Alternative Land Use Maps AB and AC do deviate from the 1975 Martis Valley General Plan that the Board reiterated its support for, through the elimination of land uses for Sierra Pacific's property.)

222-18

Page 6.02 (Table 6.0-1). As noted above, the Clustered Land Use Alternative and Reduced Intensity Alternative do not precisely match Alternative Land Use Maps AB and AC. Nevertheless, the Clustered Land Use Alternative and the Reduced Intensity Alternative have numbers close to Alternative Land Use Maps 1 (AB) and 1 (AC), and Alternatives 1 and 2 have more severe air quality impacts than the Proposed Project, with a number of differences between Alternative 2 and the Proposed Project only very slight, i.e., more impacts should be deemed as equal between the Proposed Project and Alternative 2 than shown in Table 6.0-1.

222-19

Thank you again for the opportunity to comment on the DEIR.

Very truly yours,

SANDBERG & LO DUCA



Marcus J. Lo Duca

MLD/tb

cc: Gary Blanc
Gerry N. Kamilos
Rick W. Jarvis, Esq.
Amrit Kulkarni, Esq.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 222: **MARCUS J. LoDUCA, SANDBERG & LoDUCA, ATTORNEYS AT LAW**

Response 222-1: Comment noted. The following text changes are made to the Draft EIR.

- Page 3.0-8, the following text change is made to the first paragraph:

“In 1993, the Town of Truckee incorporated and established Town boundaries that make up a majority of the Nevada County portion of Martis Valley. Since incorporation, the Town has adopted the Town of Truckee General Plan (1995) and the Downtown Truckee Specific Plan (1997), which direct urban-type land uses in the Town of Truckee portion of Martis Valley. In addition to land use planning activities by the Town, both Placer and Nevada Counties have adopted updated county-wide general plans in 1994 and 1995, which updated land use designations and policies associated with the unincorporated portions of the counties. **Figure 3.0-3** illustrates current land use designations under the Nevada County General Plan for Martis Valley, while **Figure 3.0-65** shows current Placer County General Plan land use designations for the Placer County portion of Martis Valley. This Martis Valley Community Plan and EIR consider only those lands within Placer County, exclusive of Nevada County and the Town of Truckee.”

Response 222-2: Comment noted. Since the property currently does not have an active application, no changes to Table 3.0-1 are recommended.

Response 222-3: Comment noted. The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis).

Response 222-4: Comment noted. The following text changes are made to the Draft EIR.

- The following edit is made to the sixth paragraph, Page 4.1-3 under Land Ownership,

“Sierra Pacific is the largest single landowner within the Placer County portion of Martis Valley, with approximately 7,972 ~~7,343~~ acres (29 ~~32~~ percent).”

Response 222-5: Comment noted. Plate 3 from the 1975 Martis Valley General Plan is specifically noted on Draft EIR page 4.1-8.

Response 222-6: The commentor’s statements regarding the Martis Valley Community Plan Policy 1.F.6 are noted and will be forwarded to the Placer County Planning Commission and Board of Supervisors as part of project consideration.

Response 222-7: Comment noted. The following text changes are made to the Draft EIR.

- Page 4.2-2, the following text change is made to the last paragraph:

“The 1994 Placer County General Plan identifies the holding capacity of Martis Valley Community Plan area at 25,262 persons, projecting 9,391 D.U. at buildout (Placer County does not differentiate between

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

permanent and secondary residences within Martis Valley). The existing population, 1,000 persons, is calculated from the 1990 Census for unincorporated area within Placer County and the 1994 Department of Finance's estimates. ~~The Martis Valley holding capacity is calculated as 80 percent of the maximum 1994 buildout capacity (Placer County, 1994), or 20,209 persons."~~

Response 222-8: Comment noted. The following text change is made to the Draft EIR.

- Page 4.2-3, the following bullet is added:
 - "680 acres owned by Sierra Pacific that has been identified to provide approximately 1,360 D.U. as well as commercial uses."

Response 222-9: Comment noted. The commentor is referred to Table 6.0-1 in the Revised Draft EIR regarding comparison of Alternative 2 to the Proposed Land Use Diagram.

Response 222-10: Comment noted. The following text change is made to the Draft EIR.

- Page 4.4-27, the following text changes are made:
 - 1) "Project implementation would increase traffic and degrade the LOS of roadways or intersections from acceptable to unacceptable conditions or exacerbate conditions that are already at an unsatisfactory level. These standards are presented in Section 4.4.2, above;
 - 2) Project traffic would exacerbate conditions at a facility operating at lower than minimum standards without the project (as defined in the various policies presented in Section 4.4.2, above);"

Response 222-11: Comment noted. Table 4.4-14 is intended to compare the Proposed Land Use Diagram, Alternative 1 Land Use Map and Alternative 2 Land Use Map to the Existing Martis Valley General Plan Land Use Map. No changes are recommended to Table 4.4-14.

Response 222-12: Comment noted. This discussion is intended to address whether average daily traffic volume would be significant if Schaffer Mill Road was connected to Northstar and roadway connections were made to the Palisades area. This analysis is not intended to be used as a comparison of traffic benefits and detriments for each land use map.

Response 222-13: The commentor is referred to Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis).

Response 222-14: The commentor is referred to Response to Comment 158-32.

Response 222-15: The commentor is referred to Response to Comment 158-32.

Response 222-16: The commentor is referred to Response to Comment 158-32.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Response 222-17: Comment noted. The following text changes are made to the Draft EIR.

- Page 4.11-9 and -10, the following text changes are made:

“AB Alternative 1 Land Use Map

Implementation of Alternative 1 Land Use Map would result in up to 10,311 residential units, as well as office, commercial and recreational uses and facilities. Like the Proposed Land Use Diagram, this alternative would increase the demand for fire protection and emergency services in the Plan area. This alternative would have more of an impact on fire protection services than the Proposed Land Use Diagram because of the increased number of residential units, commercial and recreational uses. The Alternative 1 Land Use Map proposes residential development along State Route 267 in an area that is located outside of the TFPD and CSD service areas. This area includes sections 21 and 28 of Township 17 North, Range 17 East (Waddle Ranch). Currently this area is served by CDF, as the land is undeveloped forest. Because development associated with Alternative AB would be located outside of TFPD and CSD’s service areas, additional fire and emergency medical services would be necessary. However, compared with the Proposed Land Use Diagram, this alternative would not result in as much developed land outside of the TFPD and CSD service areas, as this alternative does not propose residential and ~~ski-based/tourism/~~commercial uses in the Sierra Pacific property.

AC Alternative 2 Land Use Map

Implementation of Alternative 2 Land Use Map would result in up to 7,956 residential units, as well as office, commercial and recreational uses and facilities. This alternative would increase the demand for fire protection and emergency services in the Plan area. Like Alternative AB, this alternative proposes residential development along State Route 267 in an area that is located outside of the TFPD and CSD service areas. This area includes sections 21 and 28 of Township 17 North, Range 17 East (Waddle Ranch). Currently this area is served by CDF, as the land is undeveloped forest. Because the proposed development would be located outside of a service area, this would require additional fire and emergency medical services. Like the Alternative 1 Land Use Map, this alternative would not result in a residential and commercial (~~ski-based/tourism/~~) land use along the east side of SR 267 in the Sierra Pacific Property. Therefore, this alternative would have less development located outside of existing service areas than the Proposed Land Use Diagram. “

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Response 222-18: Comment noted. A Revised Draft EIR with an expanded alternatives analysis has been publically released since the Draft EIR. The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis).

Response 222-19: Comment noted. A Revised Draft EIR with an expanded alternatives analysis has been publically released since the Draft EIR. The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis).

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 223

Date: July 12, 2002

Attn.: Lori Lawrence
Environmental Review Technician
Placer County Planning Dept.
11414 "B" Ave.
Auburn, Ca. 95603

PLACER COUNTY
DATE
RECEIVED
AUG 20 2002
PLANNING DEPARTMENT

Re: **Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050**

Dear Ms. Lawrence:

Thank you for the opportunity to comment on the above-referenced Plan Update and Draft Environmental Impact Report. I am particularly concerned about long-term water supply because water in the west is relatively scarce. Let's be certain that water in the Martis Valley is not wasted on amenities such as private golf courses unless there is sufficient water for all other uses first.

223-1

The DEIR fails to prove that there is sufficient water supply because it failed to consider all planned land uses such as landscaping and snow-making which would generate demand for water. Please provide detailed information about the water demands of these and other potential uses.

Although the Proposed Plan assumes an "adjusted holding capacity of only 9,220 units, the Community Plan would allow nearly twice that number of units. Without implementing a limit on the number of units, it is wishful thinking to assume that the number of units would be constructed at well below the maximum densities permitted.

223-2

Re: **Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050**

pg.

Because of this flaw in assumptions, the DEIR underestimates the amount of water required for housing development by as much as 50%. Moreover, it assumes that only 20 % of the homes will be permanently occupied. However, that ignores the fact that many of the homes will have fractional ownership or be part of a rental program. Once again, this results in an underestimation of water demand.

223-2
Cont'd

Recent newspaper accounts of the effect of global warming (now widely believed by both the federal government and scientists to be real) on the western states indicate that snow pack in the Sierras will be greatly reduced in as few as 30 years. Since most of the water for this region is a result of snowfall, water should be conserved, not wasted on private golf courses which will serve only a small percentage of the local population. I urge the county to take a long-term view toward land and water use rather than one based on short-term economic windfalls for developers.

223-3

Some current development in the Martis Valley, such as Northstar, depends on spring water. No analysis has been done on the effect of using this water on wetlands in the area. It is not adequate to assume that there is not much interaction between springs, seeps and other types of surface water with the deeper ground water which will supply water to much of the proposed development. Please do the type of analysis

223-4

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

required to prove the lack of interaction between surface and ground water which you assume in the Draft Environmental Impact Report. Also evaluate the use of spring water by development, both proposed and current, on regional wetlands.

223-4
Cont'd

New infrastructure will have to be developed to provide proposed development with water. Yet no analysis has been done to evaluate the effects of water storage units, pipes, and wells on the surrounding development. Please do the necessary studies.

223-5

It is imperative that the County demonstrate the availability of adequate water prior to allowing such intensive, water-demanding development in the Martis Valley in order to evaluate the impacts of new development on the water supply. It is not sufficient to defer the demonstration of long-term, reliable and adequate supplies of potable water to proponents of new development (Policy 6.C.1)

223-6

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

pg. 3

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

In addition, because the DEIR is so long and complicated, I request that you extend the period for comments until the end of August, 2002. Furthermore, because of the inadequacy of the DEIR, I request that the DEIR be revised and recirculated.

223-7

Sincerely yours,

Pamella Davis

(Print Name)

PAMALLA DAVIS

(Print Address)

PO Box # 402

Kings Beach, Ca

96143

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

pg. 4

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 223: PAMALLA DAVIS, RESIDENT

Response 223-1: The commentor is referred to Response to Comment 195-1.

Response 223-2: The commentor is referred to Response to Comment 195-2.

Response 223-3: The commentor is referred to Response to Comment 195-3.

Response 223-4: The commentor is referred to Response to Comment 195-4.

Response 223-5: The commentor is referred to Response to Comment 195-5.

Response 223-6: The commentor is referred to Response to Comment 195-6.

Response 223-7: The commentor is referred to Response to Comment 195-7.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

AUG-20-2002 11:23 PM

Letter 224

P. 62

August 20, 2002

To: Fred Yeager, Planning Department

Fax: 889-7499

From: Diana Yale

Re: Martis Valley Comments

How concerned are we with the long term future of Martis Valley? The focus seems to be on our lifetime only, how about future generations? Let's not be shortsighted and selfish. We should concern ourselves with more than just the "near future" of Martis Valley. It will be here all too soon.

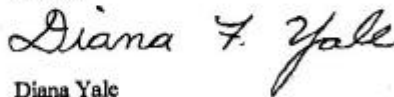
Remember this. Ninety three years ago my grandmother was born in a pristine valley full of majestic oaks, fruit trees, and redwoods gracing its foothills. Deer and quail freely roamed. A small town was built in its wake and ~~settling residents were few~~. Now I visit her in this once beautiful valley with her great-grandchildren, and we're trapped in traffic and at stoplights, can't drink the water, and can't swim in its creeks. This is now known as Silicon Valley.

While Martis Valley will never be like Silicon Valley, let's still be smart about growth for future generations. Once we start, will it end? Can it end?

Picture it. The year 2090. Longevity and good health have blessed our children. They have decided to stay in the place they were born and love. Will their grandchildren be able to drink the water, hike the meadows of wildflowers, enjoy its scenic vistas, spot mule deer and osprey, and fish and swim in its lakes and rivers?

Will our children be longing for a place that once was, angry at us for loving it to death? Or will they be thankful that we were smart, unselfish, and kind to the place where we live. The future lives now.

Signed,



Diana Yale
P.O. Box 1364
Truckee, CA 96160
587-9259

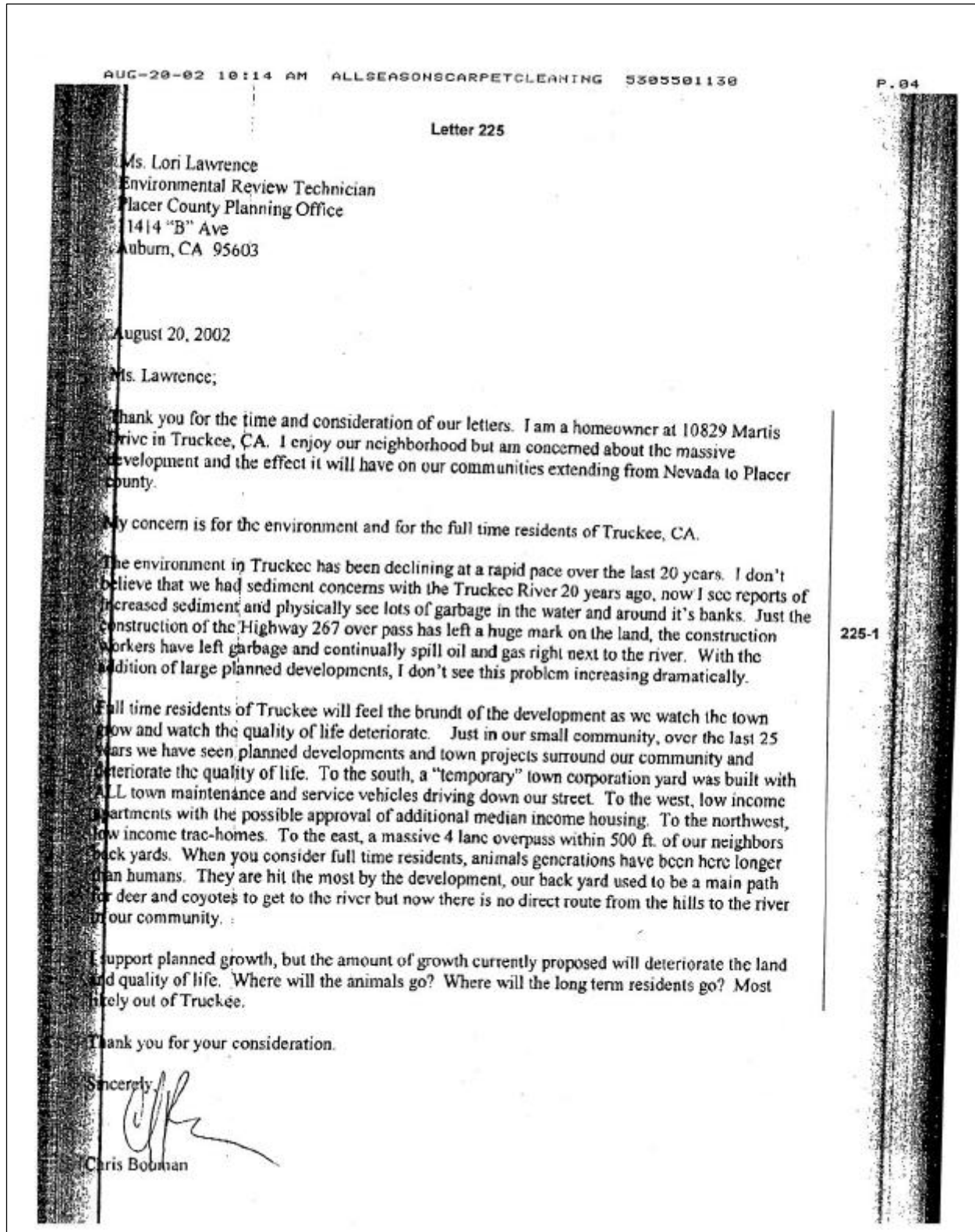
224-1

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 224: **DIANA YALE, RESIDENT**

Response 224-1: Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration. Additionally, the commentor is referred to Master Response 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR).

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR



3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 225 CHRIS BOUMAN, RESIDENT

Response 225-1: Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration. Additionally, the commentor is referred to Master Responses 3.4.3 (Water Quality) and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR).

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

AUG-28-02 10:12 AM ALLSEASONSCARPETCLEANING 5385501130

P.02

Letter 226

Leif & Audi Brun
10849 Martis Drive
Truckee, CA 96161
(530) 582 0230

Ms Lori Lawrence,
Environmental Review Technician
Placer County Planning Department
11414 B Ave.
Auburn, CA 95603

8/19/02

Dear Ms Lawrence;
We have lived in the beautiful Martis Valley as full time residents for more than 20 years and are in favor of conservatively planned slow growth, however, we now see many alarming development proposals which we fear will slide thru our Placer County, Nevada County and Town of Truckee planning processes with rubber stamp ease.

The people who live and work in the Martis Valley community are not pleased with the tactics of the planners who appear all too eager to approve the construction of thousands of new homes, vast commercial expansion and as many as 6 new golf courses, converting highway 267 into a virtual freeway. These very detrimental developments will severely impact our rural living environment and totally overwhelm the capacity of our infrastructures - all for the benefit of a few developers and career civil servants!

Without doubt, the developers proposing these 6500+ new homes, 750,000 sq of commercial expansion and 6 new golf courses have recognized that the existing Martis Valley Community Plan is outdated, weak and very exploitable!

Our planners in Nevada County, Placer County and Town of Truckee have repeatedly demonstrated that their primary mission is to APPROVE, APPROVE, APPROVE virtually all development proposals with absolute minimal respect for the protests and concerns of the tax paying residents of the Martis community! At present it seems obvious that the Town of Truckee planners are eager to quickly rush into approval proposals which may somehow fit under the antiquated 1988 Comprehensive Land Use Plan (CLUP) before the new and more restrictive CLUP becomes law. The new CLUP is expected within months, meanwhile the rush is on!

The residents of Martis Valley Estates have noted the continual and blatant violations of California Environmental Law by the Town of Truckee ongoing operation of its' "temporary" maintenance yard, located adjacent to homes on Rosa Court. This facility was granted a permit to operate on a "temporary" basis 8 years ago and now the planners are seeking approval to make this travesty more permanent! The residents are unanimous in their desire to see the maintenance yard with its' illegal fuel tank removed from their neighborhood and greatly favor the recent proposal put forth by the Truckee Tahoe Airport Manager, to facilitate the relocation. We are told by Mr. Tony Lashbrook, Planner for Town of Truckee, that moving the "temporary" yard is his #1 priority, yet we also hear reports from his colleagues that the move is at least 5 years away. The residents are FED UP!

226-1

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

AUG-20-02 10:13 AM ALLSEASONSCARPETCLEANING 5305501130 P.03

The Ponderosa Pines project being considered by the Town of Truckee is on its' face unworthy of approval for the following reasons;

#1. The applicant has submitted flawed aircraft noise profile data which is in direct conflict with the accepted data. The applicant ignores the inescapable fact that in the future there most certainly will be many more aircraft traversing our neighborhood and that his proposed project would place more homes in a potentially dangerous location, as well as increase the number of potential complainers about aircraft noise.

#2. The applicant has requested zoning variations which are completely incompatible with the standards found elsewhere in Truckee.

#3. The applicant has proposed to impose economic restrictions on the future owners of the proposed homes which seem more appropriate in a socialistic society, ie. the homeowners would be prevented from selling their property at a profit! Is this an effort to keep poor people poor? Is this America? Is the developer living with such restrictions on his private property?

#4. The very obvious disruption and destruction of the natural wetlands forest and wild life habitat. There is precious little left in our community and it is vital to preserve it!


#5. The Martis Valley Estates neighborhood is comprised of moderate and high end homes adjacent to the Ponderosa Golf Course and has already absorbed 2 low income housing projects in the near vicinity. When is enough enough?

#6. The residents of Martis Valley Estates are unanimously opposed to the Ponderosa Pines project!

The focus of my protest is this;

THE MARTIS VALLEY COMMUNITY PLAN IS COMPLETELY OBSOLETE AND FAILS TO SERVE AND PROTECT OUR COMMUNITY. IT SHOULD BE REWRITTEN AND IN THE MEANWHILE, DEVELOPERS MUST BE RESTRAINED!

The Town of Truckee must stop its' illegal operation of the "temporary" maintenance yard and stop contemplating the spending of taxpayers money for absurd fees to relocation consultants and move forward to accept the very sensible proposal recently put forth by the Truckee Tahoe Airport Manager, Mr. David V. Gotschall.

Sincerely, 
Reif Brun

copies to:

SIERRA WATCH	JEFFREY E. DAVIS
MNT AREA PRESERVATION	STACY RUSSEL
PLACER CTY BRD of SUP	PAMELA A. SCHWARZ
NV CTY BRD of SUPERV	GLEN MILLER
TOWN of TRK COUNCIL	MARGARET OLIVIER
D. V. GOTSCHALL	DEBRA & RICHARD FUQUA
D. A. DICKINSON	DARREN LIPSMAYER
TONY LASHDROOK	BILL HANSON

226-2
226-3
226-4

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 226 **LEIF AND AUDI BRUN, RESIDENTS**

Response 226-1: Comment noted. The commentor does not comment on the adequacy of the Draft EIR. Therefore, no response is necessary.

Response 226-2: Comment noted. The commentor does not comment on the adequacy of the Draft EIR. Therefore, no response is necessary.

Response 226-3: Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.

Response 226-4: Comment noted. The commentor does not comment on the adequacy of the Draft EIR. Therefore, no response is necessary.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 227

From: Tom Sparks <tomsparks@yahoo.com>
To: <bcombs@placer.ca.gov>, <planning@placer.ca.gov>
Date: 8/19/02 4:56PM
Subject: Martis Valley DEIR

Mr Combs,
I am writing to you in response to the MARTIS VALLEY COMMUNITY PLAN UPDATE. The Placer County Planning Department is being irresponsible in its fiduciary duty to the citizens of said county by not proposing land use plans which provide for no or minimal development. The plans outlined in the DEIR amount to what can only be considered the creation of an entire city in what is now a beautiful natural environment.

227-1

The Proposed Plan (PP) is based on almost thirty-year old land use designations. The DEIR does not offer any analysis to support the prior land designations. The alternatives explicitly analyzed all call for similar development of the Martis Valley. That is, the footprints of development for the major alternatives analyzed are similar and the numbers of dwelling units proposed range from 7,956 to 10,311 for the three new "alternatives" (4.2-15) analyzed. This range of alternatives does not constitute a "reasonable range" as required under CEQA. There is no analysis of an alternative that calls for minimal development. There is no designation of an alternative as the environmentally superior one as required by CEQA. The PP does not provide any arguments in support of the development of numerous golf courses in the plan area. No discussion or evaluation of the issues and benefits associated with NOT permitting golf courses in the areas designated as "Open Space".

227-2

Collectively, the alternatives and related analyses presented in this DEIR form an inadequate basis for decision-making. A major purpose of Environmental Analysis is creating information that permits decision makers and the public to distinguish among the likely environmental and other effects of the various alternatives studied. This DEIR appears to have been prepared with a view of supporting a level of development (i.e., the PP) that is closely related to the 1974 land use designations without regard for a legitimate analysis of development alternatives for the project area. At meeting after public meeting County Planning staff dealt with concerns raised by members of the public by saying "that will be taken care of in the EIR".

227-3

In light of extremely limited range of alternatives analyzed, the assurances given by staff that concerns expressed would be addressed and analyzed have not been met in the current

227-4

227-5

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

DEIR. To meet its responsibility to the larger community and to provide the elected officials with a sound basis for their decisions, County staff should re circulate a DEIR that includes an alternative with zero additional development and one with minimal additional development.

227-5
Cont'd

227-6

Thomas Sparks
1430 Arch Street
Berkeley, CA
94708

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<http://www.hotjobs.com>

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 227 **TOM SPARKS, RESIDENT**

- Response 227-1:* Comments noted. The commentor is referred to Master Responses 3.4.2 (Assumptions Used for Development Conditions in the Plan Area) and 3.4.5 (Adequacy of the Alternatives Analysis).
- Response 227-2:* The commentor is referred to Response to Comment 227-1.
- Response 227-3:* The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis) and Section 6.0 (Project Alternatives) of the Draft EIR. As stated on on Page 6.0-17 of the Draft EIR, the environmentally superior alternative is the Reduced Intensity alternative. It should be noted that the Martis Valley Community Plan does not propose any golf courses. The Draft EIR evaluates the golf course potential in the Plan area, which assumes up to five golf courses. The potential for five golf courses was evaluated throughout the Draft EIR and included in the water supply assessment.
- Response 227-4:* The commentor is referred to Response to Comment 227-1
- Response 227-5:* The commentor is referred to Response to Comments 227-1 and 227-3.
- Response 227-6:* The commentor requests that the County prepare a revised Draft EIR and recirculate it to the public. The County considers the Draft EIR adequate for consideration of the project and consistent with the requirements of CEQA.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 228

Date: August 17, 2002

PLACER COUNTY
DATE
RECEIVED

AUG 21 2002

PLANNING DEPARTMENT

Attn.: Lori Lawrence
Environmental Review Technician
Placer County Planning Dept.
11414 "B" Ave.
Auburn, Ca. 95603

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

Dear Ms. Lawrence:

We have been coming up to Martis Creek Lake to fish and camp since the early 1980s. At that time we lived in the San Jose CA area. Seven years ago we moved to Gardnerville, NV and we are now even closer to that beautiful Martis Valley. We camp at the campground there. We and our friends and family fish in the lake. The birdwatchers in our group have enjoyed the birds in the area, especially the Great Blue Herons, White Pelicans, ducks and other birds at the lake & along the creek.

228-1

We are very distressed to hear that developers are possibly going to put 800 homes in the wildlife/creek area plus more homes near the airport. This is tragic to see such a beautiful open area be developed. More green & open areas are needed - not covering up the beautiful Martis Valley.

Please do not let developers or North Star build in that area!

Sincerely, Dorothy Jaler
Canfield

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

pg. _____

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 228 DOROTHY AND DAN YODER, RESIDENTS

Response 228-1: Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 229

ABBOTT & KINDERMANN, LLP

ATTORNEYS AT LAW

August 20, 2002

PLACER COUNTY
DATE
RECEIVED

AUG 21 2002

PLANNING DEPARTMENT

Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

Re: Martis Valley Community Plan Update Draft Environmental Impact Report

Dear Ms. Lawrence:

Thank you for the opportunity to provide comments on the Martis Valley Community Plan ("MVCP") Update Draft Environmental Impact Report ("EIR"). These comments are being filed on behalf of Ms. Gaylia Newcomb, who owns a forty (40) acre parcel, APN 80-270-011, south of SR 267 and Schaffer Mill Road. We have the following comments regarding the proposed project.

Upon reviewing the Draft EIR we note that under each of the land use map alternatives, the Proposed Land Use (PP), Alternative 1 (AB) and Alternative 2 (AC), Ms. Newcomb's property is designated as "Forest Residential." According to page 25 of the MVCP document the Forest Residential (FR) designation "is applied to areas of moderate to heavy tree cover where very low density, large parcel size averages are determined to be an appropriate land use." As indicated in the land use maps and the MVCP document parcels may range in size from 2.5 to 10 acres in Forest Residential areas. All development in such areas shall have a minimal impact on the forest environment due to the very low density of development allowed. Ms. Newcomb's property is not heavily forested but does have clusters of trees surrounded by open meadow. The standing timber has limited, if any, commercial or resource value.

229-1

According to page 13 of the MVCP, any development within the open meadow and sagebrush flats of the Martis Valley visible from SR 267, must be considered very carefully. According to the draft plan "[t]his area cannot support any new residential or commercial development. Development of any new residential or commercial structures in those open meadows and sage brush areas visible from SR 267 will result in significant damage to the scenic vistas this Plan seeks to protect." (p. 13)

229-2

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Lori Lawrence
Environmental Review Technician
Placer County Planning Department
August 20, 2002
Page 2

Because Ms. Newcomb's property contains both forested and open space areas, the MVCP policies create an internal tension within the planning document. On the one hand development in forested areas shall have a minimal impact on the forest environment and on the other the development of open space areas visible from SR 267 "will result in significant damage to scenic vistas." The net effect is that a strict application of the plan policies would result in the possibility of no development entitlements being granted for Ms. Newcomb's property. This result would be at odds with the fact that the draft plan and all of the alternatives in the EIR provide a development potential of one unit per 2.5 to 10-acre parcels. In order to harmonize the plan text with the plan maps and EIR alternatives, we request that for property possessing both open space and timbered areas, the MVCP should expressly encourage cluster development near the timbered areas of the property to reduce visual impacts. This will allow development with in Forest Residential areas while minimizing impacts to open spaces along SR 267. Given that the timber resources are so limited on my client's property, such an amendment would not harm or conflict with the underlying strategy of protecting the legitimate timber resources.

229-3

Sincerely,



William W. Abbott

WWA/msp

cc: Ms. Gaylia Newcomb

07-08.051.wpd

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 229 **WILLIAM W. ABBOTT, ABBOTT & KINDERMANN, LLP**

Response 229-1: Comments noted. The commentor does not comment on the adequacy of the Draft EIR. Therefore, no response is necessary.

Response 229-2: Comment noted. The commentor is referred to Response to Comment F-17. Additionally, the commentor is referred to Section 4.12 (Visual Resources) of the Draft EIR.

Response 229-3: Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 230



August 17, 2002

PLACER COUNTY
DATE
RECEIVED

AUG 21 2002

PLANNING DEPARTMENT

Ms. Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

Re: Draft Environmental Impact Report for the Proposed Martis Valley Community Plan Update, SCH No.:2001072050

Dear Ms. Lawrence:

Thank you for the opportunity to comment on the above-stated Draft Environmental Impact Report ("DEIR") and Plan Update ("Plan"). Of particular importance to me is the impact of the Plan on the region's biological resources, as I live in nearby Incline Village and greatly enjoy recreating in the Martis Valley area.

It is surprising to me that the Plan seemed to treat the Martis Valley as a single biological entity, rather than an integral part of a larger ecosystem, one that includes a thriving body of water -- the Truckee River. The Plan's regional setting description ignores the impact on the Truckee River, and treats the Martis Valley as if the Valley consists solely of a Sierra Nevada mountain range. How can you properly address the impact that the Plan will have, when the Plan treats Martis Valley in a vacuum, without addressing the impact of the Plan on the larger ecosystem in which the Martis Valley exists (and more importantly, to which it contributes)?

The Plan also fails to account for numerous wildlife habitats. For example, there is no discussion in the Plan about Martis Valley's function as a corridor between surrounding areas for animals such as mule deer. Further, surely there exists a more reliable, pro-active, and seemingly humane method of determining the nature of migration corridors than using data from "road kill." The Plan fails to address wildlife issues in a significant way. The manner in which the Plan treats animal and plant species seems contrary to the spirit and intent of Placer County in adopting its Habitat Conservation Plan, which will protect the diverse plant and animal species in the area.

As you are well aware, the Plan seeks to guide development in the area for the coming twenty years. As such, and in light of the fact that NO studies have been done for the Martis Valley, it is especially important that the information on the biological resources for the Plan be acutely detailed, and accurate as possible. Absent an accurate and comprehensive survey on the species in the area and their habitats, including their migratory behavior, it is impossible to

230-1

ph 775.833.1600

fax 775.833.1474

email lpearson@nviplaw.com

774 Mays Blvd., No. 10 - PMB 405 - Incline Village, NV 89451

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

determine which areas to develop and which to protect. No aspect of the Plan details which is which.

230-1
Cont'd

Are you aware that the Lahontan Cutthroat trout is a federally-threatened species? Its continued existence depends upon its ability to reproduce. Are you aware that sanding the roads in the winter causes sediment to drain into the water, which may negatively affect the ability of the cutthroat trout to spawn? Please consider this fact when determining approval of new roads and expansions of those already in existence.

230-2

The DEIR contains mitigation for the Plan to result in "less than significant impacts for the region," yet the cumulative impacts are "significant and unavoidable." Such statements are confusing and contradictory. Could this be a result of examining the project in a vacuum, as stated previously?

230-3

Please carefully evaluate all impacts of this Plan, environmental and otherwise, prior to approving it. Failure to do so could easily result in irreversible negative impacts and grave harm to the environment. People are not the only beings on the planet, and we are all responsible for protecting and preserving the environment in which we live. Please also revise and re-circulate the DEIR to address all of the environmental issues adequately and responsibly. Thank you.

230-4

Thank you again for the opportunity to comment on this important matter.

Best regards,



Lara Pearson

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 230 LARA PEARSON, LAW OFFICE OF LARA PEARSON, LTD.

Response 230-1: The commentor is referred to Response to Comments 188-1, 188-2, and 188-3

Response 230-2: The commentor is referred to Response to Comment 188-4. The commentor is also referred to Master Response 3.4.3 (Water Quality) and Sections 4.7 (Hydrology and Water Quality) and 4.9 (Biological Resources) for discussions regarding water quality and impacts on habitat.

Response 230-3: The commentor is referred to Response to Comment 188-6.

Response 230-4: The commentor requests that the County prepare a revised Draft EIR and recirculate it to the public. The County considers the Draft EIR and Revised Draft EIR adequate for consideration of the project and consistent with the requirements of CEQA.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 231

Date: 8.14.02

PLACER COUNTY
DATE
RECEIVED

AUG 19 2002

Attn.: Lori Lawrence
Environmental Review Technician
Placer County Planning Dept.
11414 "B" Ave.
Auburn, Ca. 95603

PLANNING DEPARTMENT

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

Dear Ms. Lawrence:

1) Shouldn't this project have been subject to an EIS because of the Corps of Engineers land holdings in Martis Valley?

231-1

2. TISD has planned an increase in capacity from 6.4 mgd to 9.6 mgd to take care of growth through 2024. Is this increase in capacity sufficient to handle Martis Valley development through 2024 plus all other Truckee development on the books such as PC-1 & PC-2, Old Greenwood PG-3 & other smaller high density communities (names I can't remember)?

231-2

3. As a Truckee citizen, I request a true "Citizen's Advisory" committee that is made up of citizens, retail store owners, etc & not comprised of developers as the current Citizens Advisory Committee.

231-3

4a. Traffic - Have you done any actual traffic analysis at key intersections on Sat. a.m., Sunday a.m. & Sunday p.m. These are the

231-4

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

pg. 1/2

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

231-4
Cont'd

"peak" traffic times for the Tahoe Truckee region. The traffic models that have been generated are "models" of Fri 5pm traffic which is not a problem here.

Our peak is Sat & Sunday traffic.

4b. I request "actual actual" data at the Hwy 267 / Hwy 28 intersection, traffic on 895 between Truckee & Squaw Valley / Alpine Intersections on Saturday 9 am & Saturday 4 pm & the exit resort (Squaw / Alpine) traffic on Sunday noon - 5pm.

231-5

As an engineer, ~~models~~ I know that models, in addition to calibration, need to be realistic. A "model" is only accurate if it is accurate.

I request real data on 89 traffic (Truckee to Tahoe City) along w/ "models" based on Sat & Sunday traffic.

231-6

On all items above, I request an extension on review time primarily because the Draft EIR is based on conclusions & the analysis of data is missing. I also request an EIR that contains an analysis of the data.

Tracy Cuneo
14030 Swiss Ln.
Truckee, CA 96161

Re: Draft Environmental Impact Report for the Proposed Martis Valley
Community Plan Update, SCH No.: 2001072050

pg. 2/2

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 231 TRACY CUNEO, RESIDENT

DUPLICATE LETTER—Please refer to Comment Letter 39.

Response 231-1: Regarding the commentor's request for an EIS to be prepared, the project does not involve a federal action or a NEPA component; therefore, an EIS is not required. The Martis Valley Community Plan does not propose any changes to Martis Creek Lake, which is under the jurisdiction of the U.S. Army Corps of Engineers.

Response 231-2: The commentor inquires about TTSD's wastewater treatment capacity in the Water Reclamation Plant (WRP). It should be noted that the commentor is referring to T-TSA (Truckee-Tahoe Sanitation Agency) not TTSD. As stated in Section 4.11 (Public Services and Utilities) on page 4.11-53, "A 9.6 mgd capacity would accommodate buildout conditions in the entire T-TSA service area (based on a projected population of 143,000 people), assuming a peak summer seven day average flow in the year 2015 (T-TSA, 1999)". The T-TSA service area includes Truckee, portions of the Plan area, Kings Beach, Tahoe City, Squaw Valley, Alpine Meadows, and development along the western edge of Lake Tahoe. The commentor is also referred to Response to Comment L-6.

Response 231-3: Comment noted. This comment will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration.

Response 231-4: The commentor is referred to Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis) and Section 4.4 (Transportation and Circulation) of the Draft EIR.

Response 231-5: The commentor is referred to Response to Comment 231-4.

Response 231-6: The commentor is referred to Master Response 3.4.9 (Adequacy of the Public Review Period). The County considers the Draft EIR and Revised Draft EIR adequate for the purposes of CEQA.

*Placer County
May 2003*

#0862 P.001/001

August 12th 2002

Alice and Gary Jones
P.O. Box 10974
St. Louis, MO 63141-0974

Placer County Board of Supervisors
175 Fulweiler Ave.
Auburn, CA 95603

RECEIVED BY

RECEIVED

SEP 26 2002

SEP 18 2002

PACIFIC MUNICIPAL
CONSULTANTS

CLERK OF THE
CITY OF SUPERVISORS

Dear Supervisors:

We are writing to urge you to require a revised Draft EIR for the proposed Martis Valley development. The current DEIR contains many flaws and assumptions that make it inadequate for an accurate and informed analysis.

There are several key points that need to be addressed for this project.

1. The project description assumes fewer units than are allowed, therefore the DEIR underestimates the impact on traffic, air and water quality and public services.
2. The project description assumes only a 20% permanent occupancy rate. If the rate is higher by permanent occupancy or rentals, the impacts to traffic, air and water quality and public services would again be underestimated.
3. The DEIR lacks sufficient analysis of water demand and environmental impact of new water supply facilities.
4. Finally, all of the 'project alternatives' propose significant development. None represents a 'true' alternative. The current plan is nearly 30 years old, our awareness of the fragile Lake Tahoe environment has come a long way since then. Let's require an updated plan.

Again, please require an update of this outdated plan and an EIR that addresses the full impact of such a project.

Thank you for your time.

Sincerely,

Chetanyong

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AUG 16 2002
BOARD OF SUPERVISORS

AUG 16 2002

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02: Fred Yeager
K7499
Lori Lauer
Bill Lamb

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 232 ALICE AND GARY JANG, RESIDENTS

- Response 232-1:* The commentor is referred to Master Responses 3.4.1 (Project Description Adequacy), 3.4.2 (Assumptions Used for the Development Conditions in the Plan Area), and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR).
- Response 232-2:* The commentor is referred to Master Response 3.4.4 (Water Supply Effects of the Project. The commentor is also referred to Section 4.11 (Public Services and Utilities) for a discussion of environmental impacts associated with water supply infrastructure.
- Response 232-3:* The commentor is referred to Master Responses 3.4.2 (Assumptions Used for the Development Conditions in the Plan Area) and 3.4.5 (Adequacy of the Alternatives Analysis).
- Response 232-4:* The commentor states that the Martis Valley Community Plan is outdated and the EIR does not address the full impacts of the project. The commentor fails to identify the inadequacy of the Draft EIR. The Draft EIR provided an extensive analysis of impacts associated with implementation of the project that meets the requirements of CEQA.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

OCT.01'2002 13:53		#0017 P.002/012
Sean Dowdall Letter, August 12, 2002	Letter 233	PLACER COUNTY DATE RECEIVED AUG 19 2002 LL PLANNING DEPARTMENT
Attn: Lori Lawrence Environmental Review Technician Placer County Planning Department 11414 "B" Avenue Auburn, CA 95603		
Re: Draft Environmental Impact Report ("DEIR) for the Proposed Martis Valley Community Plan ("MVCP") Update, SCH No.: 2001072050		
Dear Ms. Lawrence:		
This letter addresses serious concerns I have regarding the Draft Environmental Impact Report (DEIR) for the proposed Martis Valley Community Plan Update (MVCPU). The DEIR is a very large and complicated document. As such, I am requesting that you extend the public comment period until at least the end of September 2002 to allow further valuable input on the DEIR and provide the public a fair opportunity to evaluate this enormous document.	233-1	
The future of the Martis Valley is directly dependent upon the DEIR's assessment of the current conditions in the Martis Valley, the impacts of partial and full build- out of the MVCPU and the recommended/required mitigation initiatives or proposal of alternatives. On all counts under my partial review of the document, the DEIR is woefully inadequate to provide enough information, as required by law, to enable appropriate decisions about the future development in the Martis Valley.	233-2	
I request that Placer County address my concerns in writing with detail following each item listing (1, 2, 3, . . .) and bullet point.		
<u>Overarching Concerns:</u>		
Topically, the greatest flaws that I see with the DEIR are as follows:		
1. MVCPU and DEIR scope mismatch: There is a fundamental mismatch between the scope of development that the DEIR assesses and the development allowed/proposed in the MVCPU. The DEIR makes assumptions that grossly understate the nature, amount and density of development. On this basis alone, the DEIR should be redrafted and specifically address the maximum development allowed under the MVCPU. As an alternative, Placer County could alter the MVCPU document to match the development addressed in the DEIR.	233-3	
2. Lake Tahoe Basin: The MVCPU's impact on the Lake Tahoe Basin is ignored. Lake Tahoe is an internationally recognized natural resource that has received a significant amount of attention (legal and otherwise) to protect it and attempt to begin to restore its water quality. The following impacts on the Lake Tahoe Basin must be considered in the DEIR: traffic,	233-4	
1 of 1		

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

OCT.01'2002 13:53

#0017 P.003/012

Sean Dowdall Letter, August 12, 2002

increased number of day and multi-day visitors, destruction of wildlife habitat, loss of timber, air pollution, water pollution, noise pollution and light pollution. All of these will have critical impact on the Lake Tahoe Basin.

233-4
Cont'd

3. **Truckee:** The impact on the Town of Truckee is not adequately addressed in the DEIR. The same impacts apply that I listed for the Lake Tahoe Basin. Also, the supply of affordable housing, which already afflicts the area, will only become worse. Truckee will also bare the brunt of the increased traffic, pollution and noise. Finally, the DEIR does not indicate data gathering from the Truckee, which is a needed input to provide a complete and accurate description of existing conditions, a complete enumeration of impacts both known and potential and a very valuable source for creating alternatives and mitigating measures.

233-5

4. **Water:** The water supply and quality are not properly addressed for the Martis Valley area. Also, the impact on the Truckee River and those that depend on it downstream are not adequately addressed, specifically Reno and Pyramid Lake.

233-6

5. **I-80 Corridor:** Another significant gap in the DEIR is the MVCPU's impact on traffic, the environment and all communities up and down the Interstate 80 corridor, from Reno to Roseville.

233-7

6. **SR-89:** In addition to I-80, Highway 89 will experience more traffic and other impacts from the MVCPU. Also, with the expansion of residential, commercial and recreational development, what is known, anticipated or can be assumed about development (particularly at Squaw Valley and Alpine Meadows) should be included in the DEIR's assessment.

233-8

Traffic Concerns:

Following is a list of areas that are either not at all or not adequately addressed by the DEIR, but should be:

- The traffic analysis in the DEIR is based on an average during one time of year. The traffic analysis needs to include peak traffic at various points throughout the year, including, but not limited to: commute times and Summer and Winter weekend/holiday.
- The DEIR's assumption that 80% of new Martis Valley housing will be second home/recreational grossly understates the impact on traffic. Trends in time-sharing and rentals greatly impact the percentage of occupancy. Also, as the huge baby boom retires, they will spend more time per year at their second residences. Another trend is telecommuting which means more days per year will be spent at second homes as technology and work habits evolve.
- Weather impact on road conditions need to be considered with all of the new roads and roads being widened.
- The 267 Bypass is not yet complete. The anticipated traffic volume to be handled by the Bypass is huge, yet we don't have actual experience to know how this will impact the area.

233-9

233-10


233-11

233-12

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

OCT.01'2002 13:53		#0017 P.004/012
Sean Dowdall Letter, August 12, 2002		
<ul style="list-style-type: none">There will be a bottleneck where roads narrow from 4 lanes to 2 lanes. The areas of particular concern are on Highway 267 up the mountain from the entrance to Northstar and the area around the 267 Bypass. Bottlenecks create back-ups, which mean more stop and go traffic, more pollution and more accidents.	233-13	
<ul style="list-style-type: none">The additional traffic lights will slow the trip from Truckee to Kings Beach. This will have an economic impact (commuters and vacationers) and will create the negative impacts of stop and go traffic listed above. I'm particularly concerned about traffic lights near or on slopes and road curves that will increase accidents. Also, the spacing of traffic lights at Northstar is too close. The movement of the chain control area to accommodate the development and these traffic lights also needs to be considered.	233-14	
<ul style="list-style-type: none">The traffic impact at the railroad tracks, the intersection of 267 in downtown Truckee and the turnoff to West River Road needs to be addressed in more detail. These are already major areas of traffic concern and are much worse with even a small increase in traffic.	233-15	
<ul style="list-style-type: none">The MVCPU impact on traffic on Highway 89 and Interstate 80 from Reno to Roseville, needs to be addressed. There are already jams on these roads and Winter weather devastates traffic flow. There will be an increasing number and more severe accidents. Maintenance requirements and costs will also drain funding sources, as will emergency response activities.	233-16	
<ul style="list-style-type: none">Snow removal requirements and impacts (traffic, pollution and economic) need to be addressed, particularly where there are widened roads (267 especially) and new roads.	233-17	
<ul style="list-style-type: none">New and/or improved roadways to provide emergency access to expanded and new development areas is not adequately addressed in the DEIR. The DEIR indicates areas of development, but many of these only have one road access. This will not only create traffic problems, but also is a severe safety concern in the advent of forest fires, heavy snowfalls, earthquakes and other events. On the other hand, emergency access roads, which ultimately will become full service roads create new impacts on the environment and traffic. The full scope of the development in the MVCPU needs to be described in the DEIR with the full scope of roadways and their impacts.	233-18	
<ul style="list-style-type: none">Traffic patterns and impacts are not adequately assessed in regards to the location of much of the proposed development. Specifically, direct access to 267 from commercial development and residential areas needs to be closely analyzed and recommendations/alternatives should be included that indicate ways to mitigate this impact. Again, this is now a big problem and will get much worse with more development and traffic.	233-19	
<p>Finally, the DEIR does not suggest overall alternatives to the MVCPU. High, medium and low development scenarios should be analyzed so that the community, county and other interested constituents can have full information to make the right decisions. An ideal DEIR document would outline: with this level of development done in this way (start with the true maximum build-out of the MVCPU), these are the impacts you will encounter and here's how they</p>	233-20	
3 of 3		

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

OCT.01'2002 13:54	#0017 P.005/012
Sean Dowdall Letter, August 12, 2002	
should/could be addressed. Then, describe another level of development that is 40% lower and another 80% lower than the MVCPU. That way, all would have the right information to guide our overall vision and development decisions for the Martis Valley.	233-20 Cont'd
I will send additional letters addressing other areas of concern, including water, pollution, wildlife and environmental protection.	233-21
Sincerely,	
 Sean Dowdall 2032 Scott Street San Francisco, CA 94115 415.885.8518 4018 Skiview, Northstar	
4 of 4	

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 233 SEAN DOWDALL, RESIDENT

- RESPONSE 233-1:* Comment noted. The commentor is referred to Master Response 3.4.9 (Adequacy of the Review Period) on requests that the review period be extended.
- Response 233-2:* The commentor states that the Draft EIR is woefully inadequate, but the commentor fails to identify the inadequacies of the Draft EIR. The Draft EIR is based on extensive analysis of project impacts and utilizes technical reports, mapping, and review of qualified professionals.
- Response 233-3:* The commentor is referred to Master Responses 3.4.1 (Project Description Adequacy), 3.4.2 (Assumptions Used for the Development Conditions in the Plan Area), and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR).
- Response 233-4:* The commentor is referred to Master Response 3.4.6 (Consideration of the Impacts to the Tahoe Basin).
- Response 233-5:* The commentor is referred to Master Responses 3.4.2 (Assumptions Used for the Development Conditions in the Plan Area) and 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR).
- Response 233-6:* The commentor is referred to Master Response 3.4.4 (Water Supply Effects of the Project).
- Response 233-7:* The commentor is referred to Master Responses 3.4.7 (Adequacy of the Cumulative Setting and Impact Analysis in the Draft EIR) and 3.4.10 (Adequacy of the Traffic Impact Analysis).
- Response 233-8:* The commentor is referred to Response to Comment 233-7.
- Response 233-9:* The commentor is referred to Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis).
- Response 233-10:* The commentor is referred to Master Responses 3.4.2 (Assumptions Used for the Development Conditions in the Plan Area) and 3.4.10 (Adequacy of the Traffic Impact Analysis).
- Response 233-11:* The commentor is referred to pages 4.11-94 through -97 in Section 4.11 (Public Services and Utilities) for a discussion of road maintenance and snow removal impacts.
- Response 233-12:* The 267 Bypass is now complete and in operation. The commentor is referred to Master Responses and 3.4.10 (Adequacy of the Traffic Impact Analysis).
- Response 233-13:* Comments noted. The commentor does not raise any specific issue or request changes in the Draft EIR.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

- Response 233-14: The commentor is referred to Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis).
- Response 233-15: The commentor is referred to Response to Comment 233-14.
- Response 233-16: The commentor is referred to Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis). Pages 4.11-7 through -24 in Section 4.11 (Public Services and Utilities) of the Draft EIR includes a discussion of impacts on fire protection, emergency medical, and law enforcement services.
- Response 233-17: The commentor is referred to Response to Comment 233-11.
- Response 233-18: The commentor is referred to Response to Comment 233-16.
- Response 233-19: The commentor is referred to Master Response 3.4.10 (Adequacy of the Traffic Impact Analysis).
- Response 233-20: The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis).
- Response 233-21: Comment noted. The commentor does not comment on the adequacy of the Draft EIR. Therefore, no response is necessary.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 234

MAY.02'2003 14:41

#0340 P.002/043

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April 29, 2003

VIA FACSIMILE & REGULAR MAIL

(530) 886-3003

Lori Lawrence
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

RECEIVED
APR 30 2003
PLANNING DEPT.

Re: Martis Valley Community Plan Update - Revised Draft Environmental Impact
Report ("RDEIR") (SCH No. 2001072050)

Dear Ms. Lawrence:

This letter is submitted on behalf of East West Partners, the owner of several properties located within the Northstar-at-Tahoe resort community and the Martis Valley Community Plan ("MVCP") area. As a general comment, the original Draft Environmental Impact Report ("DEIR"), and the Revised Draft Environmental Impact Report ("RDEIR") reflect a comprehensive analysis of a reasonable range of alternatives as required by the California Environmental Quality Act ("CEQA") (Pub. Resources Code, § 21000 et seq). We commend County staff and the consultant for endeavoring to provide the public and agency decisionmakers with such a thorough analysis.

Although the lowest-intensity alternative, considered for the first time in the RDEIR, would avoid or substantially lessen some of the otherwise significant environmental effects of the Proposed Land Use Diagram, the alternative is fiscally infeasible on a project level and will not attain the basic objectives of the MVCP Update.

The lowest-intensity alternative proposes the addition of a mere 2,646 residential units, including the approved and proposed employee housing units associated with Eaglewood and Northstar, and a total of 1,097,000 square feet for potential office and commercial space. (RDEIR, at p. 6.0-38; Figure 6.0-3.)

234-1

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

MAY.02'2003 11:41

#0340 P.003/003

Lori Lawrence
April 29, 2003
Page 2

The lowest-intensity alternative would therefore not achieve the following Martis Valley Community Plan Objectives:

- Goal 1.B: "To provide adequate land in a range of residential densities to accommodate the housing needs of all income groups expected to reside in Martis Valley."
- Goal 1.C: "To designate adequate commercial land for and promote development of commercial uses to meet the present and future needs of Martis Valley residents and visitors and maintain economic vitality."
- Goal 1.D: "To designate adequately-sized, well-located areas for the development of public facilities to serve both community and regional needs."
- Goal 1.E: "To designate land for and promote the development and expansion of public and private recreational facilities to serve the needs of residents and visitors."
- Goal 1.K: "To maintain a healthy and diverse local economy that meets the present and future employment, shopping, recreational, public safety, and service needs of Martis Valley residents and to expand the economic base to better serve the needs of residents."

234-1
Cont.

Accordingly, the lowest-intensity alternative would not fulfill many of the project objectives and should be rejected. As noted in the RDEIR, the lowest-intensity alternative would also result in approximately 41% fewer residential units and is therefore in conflict with the direction given by the Board of Supervisors that no major changes to the existing Martis Valley General Plan (1975) are required as part of the update process. (RDEIR, at p. 6.0-50.)

Considering the potential creation of 4,990 full-time jobs under the lowest-intensity alternative, Goal 1.B would be thwarted entirely by the resulting jobs-housing ratio of 4.64, as compared to the 2.56 ratio under the Proposed Land Use Diagram. (See RDEIR, at p. 6.0-41.) As recognized in the RDEIR, such a jobs/housing imbalance could result in potentially significant indirect environmental (air quality and traffic) impacts from commuting workers.

234-2

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

MAY.02'2003 14:41

#0340 P.004/043

Lori Lawrence
April 29, 2003
Page 3

The shrunken areas proposed for development within Northstar under the cluster (RDEIR, Figure 6.0-1), reduced-intensity (RDEIR, Figure 6.0-2), and lowest-intensity (RDEIR, Figure 6.0-3) land use alternatives, also appear to conflict with the development proposed as part of the Northstar-at-Tahoe Highlands project (SCH No. 2003012086). The County is in the process of preparing the Final EIR for the Highlands project which includes approximately 1,866 multi-family residential units, a hotel, recreational amenities, and various infrastructure improvements.

234-3

Consequently, the County should consider whether the above-listed alternatives would conflict with the Northstar-at-Tahoe Highlands project, and the Northstar Village project (SCH No. 2001012081). Given the existing infrastructure within Northstar, the development envisioned under the Northstar Master Plan, and the ability of the area to accommodate approximately 1,800 additional residential units, no purpose would be served by eliminating units from the Northstar area as part of the MVCP update.

Thank you for your consideration of our comments. Please call if you have any questions.

Very truly yours,


Whitman F. Manley

cc: Roger Lessman

30417129.002

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 234: WHITMAN MANLEY, REMY, THOMAS, MOOSE AND MANLEY, LLP

- Response 234-1* The commentor notes that the Lowest Intensity Alternative would not achieve proposed Martis Valley Community Plan Goals 1.B, 1.C, 1.D, 1.E and 1.F and would be in conflict with the direction given by the Placer County Board of Supervisors. This comment is noted. The Revised Draft EIR notes that this alternative may not be considered in conformance with Board of Supervisor's direction as well as may be less than adequate to meet Goal 1.B (Revised Draft EIR page 6.0-50).
- Response 234-2* The commentor's statements regarding the Revised Draft EIR's documentation of the jobs-housing ratio of the Lowest Intensity Alternative would be worse than the Proposed Land Use Diagram is noted. Since no comments regarding the adequacy of the Revised Draft EIR were received, no further response is required.
- Response 234-3* It is acknowledged that the Lowest Intensity Alternative land use map may conflict with the current form of the proposed Northstar Highlands project. However, it is not anticipated that this alternative would conflict with the currently proposed expansion of the Northstar Village project. The commentor's statements regarding concerns involving the elimination of existing development potential within the Northstar-at-Tahoe resort community is noted.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 235

MAY.02'2003 14:42

#0340 P.005/043

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April 30, 2003

RECEIVED
MAY 01 2003
PLANNING DEPT.

Ms. Lori Lawrence
Environmental Review Technician
County of Placer
Planning Development
11414 B Avenue
Auburn, CA 95603

Re: Martis Valley Community Plan Update ("MVCP Update") Revised
Draft Environmental Impact Report ("RDEIR") [State Clearinghouse
Number 2001072050]

Dear Ms. Lawrence:

On behalf of Sierra Pacific Industries ("SPI"), I want to thank you for the opportunity to comment on the RDEIR for the MVCP Update.

Relative to the revised Alternatives Analysis, SPI's comments can be briefly summarized, as follows:

1. The Clustered Land Use Alternative, the Reduced Intensity Alternative, and the Lowest Intensity Alternative, each with sharply reduced units and reduced private and public recreational facilities compared to the Proposed Project, each fail to fulfill the following key objectives of the MVCP Update, as set forth at pages 3.0-19 and 3.0-20 of the MVCP Update DEIR:

Goal 1.B: To provide adequate land in a range of residential densities to accommodate the housing needs of all income groups expected to reside in Martis Valley. [All three alternatives, particularly the Lowest Intensity Alternative, are unable to satisfy this objective].

Goal 1.E: To designate land for and promote the development and expansion of public and private recreational facilities to serve the needs of residents and visitors.

235-1

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

MAY.02*2003 14:42

#0340 P.006/043

Ms. Lori Lawrence
Environmental Review Technician
April 30, 2003
Page 2

Goal 1.K: To maintain a healthy and diverse local economy that meets the present and future employment, shopping, recreational, public safety, and service needs of Martis Valley residents and to expand the economic base to better serve the needs of residents (DEIR pages 3.0-19,20).

235-1
Cont.

2. Each of these alternatives also would be inconsistent with the 1998 direction from the Placer County Board of Supervisors that major changes to the land use designations from the 1975 Martis Valley Community Plan were not appropriate (RDEIR, page 6.0-1).
3. Including insufficient future residential development in these 3 alternatives will force employees to travel outside of the MVCP Plan Area for housing, resulting in more severe impacts for these alternatives relative to transportation and circulation, noise, and air quality (RDEIR, pages 6.0-18, 6.0-31, and 6.0-41).
4. By providing for far less housing opportunities than the Proposed Project, these three alternatives provide for an inadequate jobs-housing balance in the Community Plan area overall compared to the Proposed Project.
5. By providing for far less housing opportunities than the Proposed Project, these three alternatives, while resulting in less public service demands, will generate far less revenue in impact fees needed to fund public facilities.

235-2

235-3

We appreciate the opportunity to comment on the RDEIR.

Very truly yours,

SANDBERG, LO DUCA & DELLINGER


Marcus J. Lo Duca

MLD/jy

cc: Gary Blanc
Gerry N. Kamilos
Rick W. Jarvis, Esq.
Amrit Kulkarni, Esq.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 235: MARCUS LO DUCA, SANDBERG, LO DUCA & DELLINGER

Response 235-1 The commentor states that the Clustered Land Use Alternative, Reduced Intensity Alternative and Lowest Intensity Alternative would not achieve proposed Martis Valley Community Plan Goals 1.B, 1.E and 1.K. This comment is noted. The Revised Draft EIR notes that this alternative may not be considered in conformance with Board of Supervisor's direction as well as may be less than adequate to meet Goal 1.B (Revised Draft EIR page 6.0-50).

Response 235-2 The commentor is referred to Response to Comment 235-1.

Response 235-3 The commentor states that the Clustered Land Use Alternative, Reduced Intensity Alternative and Lowest Intensity Alternative would result in additional employee housing issues and inadequate jobs-housing balance in the Plan area as compared to the Proposed Land Use Diagram and would generate less revenue in impact fees to fund public facilities. These comments are noted. The Revised Draft EIR notes that these alternatives would result in worse jobs-housing ratios than the Proposed Land Use Diagram.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 236	
MAY.02'2003 14:42	#0340 P.007/043
<p>Sean Dowdall 2032 Scott Street San Francisco, CA 94115 415.885.8518</p> <p>4019 Skiview, Northstar</p> <p>Lori Lawrence Senior Planning Technician Placer County Planning Department 11414 B Avenue Auburn, CA 95603</p> <p>Re: Comments on the Revised Draft Environmental Impact Report for the Martis Valley Community Plan Update; SCH No. 2001-72050</p> <p>Dear Ms. Lawrence:</p> <p>Community Plan Update alone and in combination fall short of meeting CEQA's requirements for an adequate alternatives analysis for the following reasons:</p> <ul style="list-style-type: none">▪ The RDEIR and DEIR Fails to Analyze a Reasonable Range of Alternatives to the Project▪ The RDEIR Fails to Adequately Describe and Therefore Analyze the New Alternatives▪ The RDEIR Fails to Provide Sufficient Information Necessary to Support An Informed Comparison of the Alternatives to the Project and One Another▪ The RDEIR Fails to Adequately Disclose Inconsistencies Between the New Alternatives and Existing Plans and Policies▪ The RDEIR Sets Up Improper Arguments for Rejection of Environmentally Superior and Feasible Alternatives <p>Our detailed comments on these defects are described below. As noted in the RDEIR, we anticipate that all comments submitted on the DEIR for the Martis Valley Community Plan update, including comments on the DEIR's alternatives section not adequately responded to in the RDEIR, will be responded to in the Final EIR or in additional revised, recirculated DEIR sections.</p> <p>I. Introductory Comments</p> <p>Last month, Placer County released new "conservation alternatives" to the alternatives described in the Draft EIR for the Martis Valley Community Plan Update. The new</p>	
	236-1
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3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

MAY.02'2003 14:42

#0340 P.008/043

alternatives are described in an RDEIR to the Martis Valley Community Plan Update, a document purportedly prepared to meet the requirements of the California Environmental Quality Act, CEQA. Alternatives included in the RDEIR include:

- A "no project" alternative, which retains the 1975 Martis Valley General Plan and land use map;
- A "clustered" land use alternative, which locates the majority of proposed new development on fewer acres of each project site;
- A "reduced density" alternative, which reduces holding capacity to 7,150 units (4,423 new units) and reduces total acres of non-residential uses (e.g. commercial uses); and
- The "lowest-intensity" alternative, which reduces holding capacity to 5,383 units (2,646 new units) and total potential office and commercial square footage to 1,097,000 square feet.

The RDEIR rejects without analysis an alternative that would require the development to be transferred out of the Martis Valley to the Town of Truckee. Such an alternative was suggested for review in numerous comments on the DEIR for the Martis Valley Community Plan update.

While, each new alternative includes isolated elements of sound conservation planning, none present a comprehensive, responsible plan for the future of Martis Valley. Each would still be devastating to the region's wildlife habitat, Sierra scenery, and present quality of life. None of the new alternatives combines a reduced intensity of development with a smaller development footprint (e.g. a reduced intensity clustered development alternative), which would achieve significant conservation results.

Most problematic is that the RDEIR rejects each new alternatives as being inconsistent with Board direction provided at the outset of the planning process – direction that called for the land uses proposed for the Valley in 1975 to remain in tact. As Sierra Watch and others have repeatedly stated, a 30-year old land use plan warrants real public debate and real alternatives for public review and debate. CEQA also requires an evaluation of a reasonable range of alternatives to address significant environmental impacts. Instead of providing a meaningful General Plan update process and legally adequate RDEIR, this RDEIR is signaling that the County will stick with their original blueprint for the Valley and reject a new vision for the Martis Valley that could avoid significant impacts related to traffic, air quality, public services and resource values. Our detailed comments on the inadequacies of the RDEIR are set forth below.

II. The RDEIR Alone and In Combination with the DEIR Is Inadequate

A. The RDEIR and DEIR Fail To Analyze A Reasonable Range of Alternatives

The requirement for an EIR to analyze alternatives is critical to CEQA's substantive mandate to avoid significant environmental damage where feasible. In order to carry out this mandate, an EIR must consider a *reasonable range* of alternatives to the project, or the location of the project, which a) offer substantial environmental

236-2
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236-3

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

MAY.02'2003 14:43

#0340 P.009/043

advantages over the project proposal and b) may be "feasibly accomplished in a successful manner" considering the economic, environmental, social and technological factors involved. *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 566. The RDEIR alone and in combination with the DEIR fails to adequately address a reasonable range of alternatives. Specifically, the new alternatives were not directed at minimizing or eliminating project impacts to the fullest extent feasible as required by CEQA. Instead, each new alternative contains only isolated advantages over the proposed project such as a reduced development footprint or reduced total development. None of the alternatives combine these "conservation" concepts to complete an alternative that would effectively address the significant unavoidable impacts of the project on biological resources, traffic, air quality, affordable employee housing as well as other impacts.

In our comment letter on the DEIR dated August 16, 2002, the organizations requested that a number of other alternatives be considered in a revised DEIR. Those alternatives were directed at reducing or eliminating the significant adverse impacts of the proposed project and included:

- 1) A status quo alternative that would limit new development to that which could be accommodated at acceptable levels of service by *all* existing infrastructure. (See DEIR comment letter, page 48).
- 2) A "biological and natural resources" alternative based on a comprehensive constraints map showing areas to be avoided in light of Placer County General Plan natural resource policies and environmental factors including: ridgelines, significant ecological resource areas, wildlife corridors, maintenance of large unfragmented habitats and steep slopes. (See DEIR comment letter, page 48).
- 3) A "conservation plan" alternative based on the 2001 Natural Community Conservation Planning Agreement principles (attachment A hereto). (See DEIR comment letter, page 48-49).
- 4) A "restricted development" alternative, which would limit new development in unincorporated areas and direct new development into existing cities and towns. The feasibility of an alternative that would "transfer development" into Truckee is enhanced by the fact that at least one of the Martis Valley development projects is controlled by a party that owns significant undeveloped land in the Town proper (East-West Partners). Even without such common ownerships, Transfer of Development Rights programs have successfully resulted in protecting rural areas in return for increased development rights in nearby urban areas. An alternative means of implementing this alternative would be a "purchase" of development rights program, where development fees charged on new development are used to purchase development rights from properties with scenic or other conservation values. (See DEIR comment letter, page 49).

While some information is provided in the RDEIR concerning the respective impacts of the new alternatives on the need to widen roadways, insufficient information is provided concerning the alternatives affect on the need to expand and improve other essential infrastructure such as wastewater treatment, water storage or other services.

The RDEIR also fails altogether to include alternatives that are demonstrated to avoid impacts to biological resources and be consistent with conservation policies in the

236-3
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3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

MAY.02'2003 14:43

#0340 P.010/043

County's 1994 General Plan. This omission is particularly noteworthy since Sierra Watch submitted a document to the County in December 2002, titled *Conservation Planning Principles, Martis Valley Community Planning Area*, for the purpose of guiding development of such an alternative. See Attachment A hereto. The report provides a solid rationale for the planning Martis Valley deserves – conservation planning that would protect wildlife habitat and water quality and preserve the existing quality of life. This alternative was not among those evaluated in the RDEIR. Citing Martis Valley's ecological significance, the drafters of the Report, Conservation Biology Institute (CBI), recommended in the Report that Placer County develop a "conservation plan" for the Valley that, at a minimum,

- Adheres to existing County conservation policies.
- Clusters new development around existing development.
- Prohibits development east and north of Highway 267 to protect unfragmented habitat lands and wildlife corridors.
- Establishes a regional conservation strategy before approving any new development.

236-3
Cont.

This report includes the principles for creation of a bona-fide conservation alternative at pages 4-5, Recommendations for Land Use Design. These recommendations could have easily been converted to a land use alternative for review in the RDEIR. A revised and recirculated RDEIR must include a conservation alternative based on the recommendations in the CBI Report and respond to the request for alternatives described in our comment letter on the DEIR and summarized above.

B. The RDEIR Fails to Adequately Describe New Alternatives

The RDEIR fails to adequately describe the alternatives. EIR's must provide information in sufficient detail concerning alternatives to permit a reasonable choice insofar as environmental aspects of the alternatives are concerned. Among the omissions in the descriptions of the alternatives are the following:

- 1) The specific locations of development under the clustered land use alternative. It is not clear what specific land is intended for development under the clustered alternative. A revised map should be prepared which clearly outlines the acreage intended for development on each ownership. Without this information, it is not possible to determine whether the development will impact biological resources (e.g. creek corridors), be consistent with County policy concerning avoidance of development on slopes in excess of 20% and the like.
- 2) Photo simulations or images of the proposed alternatives. The RDEIR concludes that the clustered alternative would result in more severe visual impacts as a result of the higher density of the development than the proposed project. No information or evidence is provided to support this conclusion. A revised, recirculated RDEIR must include photo-simulations or other graphic images of the alternatives and proposed development design in order to support the comparative analysis of visual and other related impacts. It is not a given that high density development is less visually intrusive or attractive than low density

236-4

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

MAY.02*2003 14:44

#0340 P.011/043

development as the section would imply. Moreover, it is also essential to this analysis that the specific location of new development be identified in revised project descriptions and graphics.

- 3) Details concerning total number of units and square footage of development for each alternative. This type of information is inconsistent for each alternative in the RDEIR. For example, there is no information about the square footage of non-residential development under the reduced intensity alternative. Both total residential/resort units and the estimated square footage of these should be provided in order to support impact analyses including for traffic and visual impacts.
- 4) Quantified information concerning the type and amount of water pollutants generated by each alternative. Without this information, a comparison of alternatives to one another is not possible.
- 5) Information concerning the total number of units (resort and for sale) under each alternative with projected purchase/rental/overnight prices. This information must be provided if Goal 1.B is to be invoked as a reason for rejection of alternatives. See RDEIR at 6.0-50. In addition, a comparison table should be included in a revised RDEIR, which includes proposed housing under each alternative, demand generated by each for affordable employee housing, additional affordable housing need generated by growth inducing effects (e.g. increased demand for low paying service jobs as a result of growth in the region, etc.). While some of this information is provided in the discussion sections, it is not easily compared.
- 6) The biological values underlying each development area for each alternative. The RDEIR contains statements such as: "The Reduced Intensity Alternative would result in less land disturbance from extensive development than the Proposed Land Use Diagram (approximately 1,000 acres less than the Proposed Land Use Diagram at buildout) that could support identified special-status plant species habitat (Great Basin scrub, mixed coniferous forest, montane meadow, and ruderal habitats), but would still have the potential to impacts special-status plant species ..." RDEIR at 6.0-35. A revised and recirculated RDEIR must include maps identifying species impacted by each development footprint (including remedial grading areas, roads and other site disturbance necessary to implement the projects) and must quantify the impacts of each alternative on these species and habitats. Vague comparisons without any analysis of the land proposed for disturbance is insufficient to support the conclusions reached in the RDEIR. Other conclusory statements concerning impacts to biological species include, but are not limited to the following:

"Both the Reduced Intensity Alternative and the Proposed Land Use Diagram land uses would result in comparable impacts regarding potential impacts to the Lahontan cutthroat trout, given that both land use options have similar potential effects to Martis Creek and its tributaries." RDEIR at 6.0-36.

236-4
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3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

MAY.02'2003 14:44

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"Both the Reduced Intensity Alternative and the Proposed Land Use Diagram land uses would result in comparable impacts regarding potential impacts to the mountain yellow-legged frog, given that both land use options have similar potential effects to Martis Creek and its tributaries." RDEIR at 6.0-36.

"Both the Lowest Intensity Alternative and the Proposed Land Use Diagram land uses would result in comparable impacts regarding potential impacts to the Lahontan cutthroat trout, given that both land use options have similar potential effects to Martis Creek and its tributaries." RDEIR at 6.0-46.

"Both the Lowest Intensity Alternative and the Proposed Land Use Diagram land uses would result in comparable impacts regarding potential impacts to the mountain yellow-legged frog, given that both land use options have similar potential effects to Martis Creek and its tributaries." RDEIR at 6.0-46.

Evidence and analysis to support these and other conclusory statements throughout the RDEIR must be provided in a revised, recirculated RDEIR.

The omission of these key details, as well as other details of the new alternatives, renders the impact analyses incomplete and inadequate and therefore makes an informed choice between the alternatives and the project impossible.

C. The RDEIR Fails to Provide Sufficient Information Necessary to Support An Informed Comparison of the Alternatives

The RDEIR fails to provide sufficient information to compare the alternatives to one another and to the proposed project. While Tables 6.0-1 and 6.0-3 provide some information comparing the proposed alternatives to the project, the RDEIR fails to provide sufficient information to compare the alternatives with one another for at least the following reasons:

- First, the RDEIR fails to provide sufficient information about basic aspects of project alternatives (such as land coverage, locations and type of development) to support analysis of impacts.
- Second, the RDEIR fails to quantify many of the impacts of each alternative (e.g. public service demand; pollutants generated by each alternative, etc.).
- Third, insufficient information is provided to compare each alternative to other alternatives.

For example, under Impact 4.3.1, Abandoned Mines and Tailings, all alternatives are identified as "SUM." However, the column comparing each alternative to the project indicates that the alternatives vary in impact from greater or lesser significance when

236-4
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236-5

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

MAY.02*2003 14:44

#0340 P.013/043

compared to the project. Additional columns must be added to a revised table that indicate how each alternative compares with each other alternative and provides quantitative information about the impacts of each for respective impacts where feasible (e.g. total amount of water demand, wastewater demand, etc.). Alternatively, this information must be provided in more detailed discussions in the RDEIR text for each alternative.

Many of the discussions and conclusions contained in the RDEIR are not adequately supported by facts or evidence, but merely provide a conclusory statement of impact. For example:

"The Clustered Land Use Alternative proposes a smaller land area for disturbance and reduced development than the Proposed Land Use Diagram, especially in the Northstar area where mining facilities have been identified. Thus, this alternative would reduced [reduce] hazard impacts associated with potential abandoned mine sites." RDEIR at 6.0-21.

236-5
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The absence of a graphic depicting where clustered development would be located, coupled with a lack of information about mine sites, renders this a conclusory statement without adequate supporting evidence. Additional analysis and information to support the document's conclusions must be provided in a revised and recirculated RDEIR.

Another example is as follows:

"Both the Clustered Land Use Alternative and the Proposed Land Use Diagram land uses would result in comparable impacts regarding potential exposure to hazardous material contamination given that their mix of land uses are similar." RDEIR at 6.0-21.

Again, this sentence lacks evidence and data to support the conclusion. A revised and recirculated RDEIR must include at least some quantification of these comparable impacts to support the conclusions reached.

The above examples typify the conclusory statements, lack of analysis and evidence to support conclusions throughout the RDEIR.¹ A careful review should be given to the document and revisions made accordingly to fill in the necessary evidence and analysis required by law.

D. The RDEIR Fails to Adequately Analyze the Consistency of Alternatives with the County's General Plan and Other Applicable Policies

236-6

Table B indicates that the Proposed Land Use Diagram and all of the alternatives would result in significant impacts unless mitigated with respect to consistency with relevant

¹ Other conclusory impact statements unsupported by adequate evidence and analysis include, but are not limited to the following: 4.5.1, 4.5.4, 4.7.1-7, 4.8.2, 4.8.3, 4.9.3, 4.9.4, 4.9.5, 4.9.6, 4.9.7, 4.9.8, 4.9.11, 4.11.1.1-3, 4.11.4.1, 4.12.1-5, 4.1.1, 4.3.1, 4.3.3, 4.5.2, 4.6.1, 4.7.1-7, 4.8.2-4, 4.9.3 - 12, among others for all alternatives.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

MAY.02*2003 14:45

#0340 P.014/043

land use planning documents. Neither Table B, nor the respective RDEIR discussions concerning consistency with plans and policies provide sufficient information about potential conflicts between the alternatives and current County policies. Nor do the discussions identify the mitigation measures necessary to reconcile such conflicts. Additional information is essential concerning such project and alternative consistency with applicable plans, policies and regulations. A revised RDEIR should include a detailed "plan/policy" consistency matrix for each alternative. In the absence of this information, an informed decision cannot be made about which is the superior alternative. Moreover, the Board cannot legally approve a project or project alternative that is not consistent with applicable plans and policies.

236-6
Cont.

E. The RDEIR Suggests Improper Reasons for Rejection of Environmentally Superior and Feasible Alternatives

The California Environmental Quality Act contains a "substantive mandate" that public agencies deny approval of a project with significant adverse effects when feasible alternatives or mitigation measures can substantially lessen those effects. *Citizens for Quality Growth v. City of Mount Shasta* (3d Dist. 1988)198 Cal.App.3d 433, 440-441. In this respect, CEQA "trumps" the Board resolution initiating the Martis Valley Community Plan update and limiting the update with respect to alternative land uses. Said another way, reliance on the Board resolution is insufficient reason to reject an environmentally superior alternative or mitigation measure to the 1975 land use plan.

The RDEIR sets up the rejection of each new alternative because they "may" not conform with Board direction at the outset of the planning process – direction that called for the land uses proposed for the Valley in 1975 to remain in tact. The Board direction given at the outset of the process does not supercede CEQA's requirement that a reasonable range of alternatives be analyzed and the environmentally superior project alternative be adopted. Thus, this rationale for rejecting environmentally superior alternatives would be improper under CEQA.

236-7

If alternatives are recommended for rejection, evidence must be provided that documents their "infeasibility" as defined by CEQA. Such evidence must include reasons why the alternatives were incapable of "being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." Public Resources Code section 21061.1; CEQA definition of "feasible."

The section also sets up rejection of a number of environmentally superior alternatives because they are potentially "less than adequate to meet Goal 1.B of the proposed Martis Valley Community Plan, which states:

To provide adequate land in a range of residential densities to accommodate the housing needs of all income groups expected to reside in the Martis Valley."
RDEIR at 6.0-50.

No analysis is provided comparing the proposed project and the various alternatives with this Goal. Nor is the goal well defined. This information must be provided in addition along with the amount of new employee housing demand generated by each

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

MAY.02'2003 14:45

#0340 P.015/043

alternative and the proposed project. In all likelihood, the lowest density/intensity alternatives would be superior to the proposed project because they will result in less of an imbalance of affordable housing when compared to the proposed project (less demand for new employees and therefore additional affordable employee housing). Furthermore, even though the proposed project proposes a range of densities, these densities do not ensure a range of housing prices. Housing and resort "price" information must also be provided for the proposed project and alternatives in a revised analysis, if this Goal is to be relied upon to reject any alternatives.

236-7
Cont.

III. Concluding Comments

In light of the deficiencies in the RDEIR, the organizations respectfully request that the County revise and recirculate an adequate analysis of alternatives for development of the Martis Valley area prior to further consideration of the Community Plan Update. As part of the process of developing a legally adequate EIR for the Plan, we urge the County to convene community meetings focused on appropriate and acceptable alternatives for the future development of the Martis Valley. Again we appreciate the opportunity to comment on the RDEIR and request that the following persons be kept informed of this and other projects in Eastern Placer County:

236-8

Sincerely,

Sean Dowdall

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 236: SEAN DOWDALL, RESIDENT

- Response 236-1* The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis). Comparison of the alternatives impact to consistency with relevant plans is specifically addressed in Section 6.0 (Project Alternatives) of the Revised Draft EIR.
- Response 236-2* All comments received on the Draft EIR and the Revised Draft EIR are responded to in this document. The commentor's statements regarding the reconsideration of the land use map for the Plan area (1975 Martis Valley General Plan) and a new vision for the Plan area is noted. The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis).
- Response 236-3* The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis).
- Response 236-4* The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis) as well as Master Response 3.4.3 (Water Quality). As shown in Figure 6.0-1 of the Revised Draft EIR, development (with the exception of residential development under the Forest land use designation) under the Clustered Land Use Alternative would be limited to the specific property areas noted. Commercial and office square footage that could occur under the Clustered Land Use Alternative would be approximately 1,481,000 square feet and approximately 1,124,000 square feet for the Reduced Intensity Alternative.
- Response 236-5* The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis). While the Revised Draft EIR includes data and information on each alternative that can be used to compare the alternatives to each other, there is no requirement under CEQA to perform a comparison of the environmental benefits and detriments of the alternatives to each other separate of the comparing them to the proposed project.
- Response 236-6* While the alternatives (with the exception of the No Project Alternative and the Existing Martis Valley General Plan Land Use Map) would involve reductions in land use development as compared to the existing land use designations set forth in the Placer County General Plan, these alternatives would generally be in compliance with the General Plan. Environmental impacts that are related to applicable Placer County General Plan policies are noted throughout the Draft EIR (e.g., Draft EIR pages 4.9-51 through -54). As noted in Response to Comment 158-8, several Placer County General Plan policies have been incorporated and (in some cases) expanded upon in the proposed Martis Valley Community Plan. The commentor provides no evidence or information suggesting where such inconsistencies occur associated with the alternatives.
- Response 236-7* The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis).

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Response 236-8 The commentor's statements regarding their opinion of the adequacy of the Revised Draft EIR are noted. The County considers the Draft EIR and the Revised Draft EIR adequate for consideration of the Martis Valley Community Plan and in compliance with CEQA. The County will notice of future public meetings regarding the Martis Valley Community Plan.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 237

MAY.02'2003 14:45

#0340 P.016/043

RECEIVED
MAY 01 2003
PLANNING DEPT.

Paul Valtistas
Executive Director
North Tahoe Conservation Coalition
PO Box 1926
Tahoe City, CA 96145

Attn: Lori Lawrence
Environmental Review Technician
Placer County Planning Department
11414 "B" Avenue
Auburn, CA 95603

April 29, 2003

Re: Comments on the Martis Valley Community Plan Revised Project Alternatives

Project Alternatives:

The Revised Project Alternatives are a big improvement on the Proposed Plan as laid out in the original EIR, but still fall short of what we believe to be sensible planning. All the new Alternatives fail to recognize that it is more important to limit development on the east side of Highway 267 and that Placer County needs to set up a way to do this that is fair to all landowners.

Further to my written comments of August 15 and August 19, 2002, all the new Alternatives fail to reflect the economic reality that was so eloquently put forward by Fred Yeager last year. He stated that it is not economically credible that the area can support more than 5,854 total units by 2021. This represents approximately 3,400 new units over twenty years, and all of the proposed new Alternatives fail to review this possibility that would be both fair to property owners and to the sensitive local environment.

Given the new Alternatives presented, only one offers developments of 3,400 new units or less and therefore we would strongly recommend that the LOWEST INTENSITY ALTERNATIVE be adopted as the Proposed Plan in a Revised EIR. Please effect this change immediately, or explain in detail why the County has rejected this.

However I must note again that we would much prefer to see a plan that sets aside land to the east of Highway 267 in Martis Valley, and request that an Alternative of this nature be pursued immediately.

Water Issues:

The planning process effected many years ago in Squaw Valley identified that there would be sufficient water to allow for the Intrawest Village development. The reality has proven to be very different. There is in fact insufficient water in Squaw Valley to allow the Village to move to completion, and this indicates that planning process systemically overestimates the amount of available water. This clearly demonstrates that the up-front assurances that there was enough water in Squaw Valley were badly wrong.

237-1

237-2

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

MAY.02'2003 14:16

#0340 P.017/043

We are now being assured that there is enough water in Martis Valley to support large scale development. However right now, today, there are water shortages in the Glenshire area and this would indicate that water issues for all Alternatives are not properly reflecting reality. Please provide details of the water plans for Squaw Valley at the time of planning and the details of the water now found to be available. Would it prudent to scale down the proposed level of development to reflect the experience and reality of what occurred in Squaw Valley?

237-2
Cont.

Planning Process:

NTCC wishes to register its concern that a number of projects are being allowed to proceed without the new Martis Valley Community Plan (MVCP) in place. All constituents have agreed that the old 1975 Plan is no longer appropriate and are pursuing a process to replace it with something more appropriate. It seems unacceptable that certain developers are proceeding with specific projects before the new MVCP is in place. NTCC is very concerned that this occurring with the Siller Brothers development and with the Northstar Highlands development. Please explain why this is being allowed to happen.

237-3

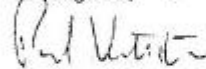
The MVCP process is now running 12 months behind its original schedule. It therefore seems appropriate to put a 12-month moratorium on all projects that fall under the geography of the new plan. Please put this into effect, or explain why it is not possible.

Additional comments:

I attach two documents reflecting additional specific concerns. The first is a list of comments on the Revised Draft EIR (RDEIR). The second is a transcript of comments read into the public record at the Board of Supervisors meeting on April 28 in Kings Beach.

237-4

Kind regards,



Paul Vatisas
Executive Director
NTCC

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

MAY.02'2003 14:46

#0340 P.018/043

COMMENTS ON THE RDEIR

- The RDEIR still fails to adequately address a reasonable range of alternatives for the following reasons: First, the new alternatives were not directed at minimizing or eliminating project impacts to the fullest extent feasible as required by CEQA. A bona-fide "conservation" alternative must be analyzed in a revised DEIR (see outline of that alternative in the CBI report).
- Second, the RDEIR fails to adequately describe the alternatives. Key details concerning the alternatives are not disclosed, which renders the analyses inadequate. Such project description omissions include, but are not limited to: the specific location of development under the cluster alternative; the total amount of non-residential development under the reduced intensity alternative, new car trips generated by each alternative; and the like.
- Third, the RDEIR fails to provide sufficient information to compare the alternatives to one another and to the proposed project.
- Finally, the RDEIR rejects each new alternative as "infeasible" without providing sufficient evidence. Such evidence would have to include reasons why the alternatives were incapable of "being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." Public Resources Code section 21061.1; CEQA definition of "feasible."

237-5

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

MAY.02'2003 14:46

#0340 P.019/043

NTCC PUBLIC COMMENTS ON APRIL 28, 2003

Pursuant to the NTCC Board Meeting on April 21, 2003.

Martis Valley Community Plan (MVCP)

NTCC continues to oppose the scale of proposed development in Martis Valley. This is because there is no rationale for this scale of development on economic, water supply, and environmental grounds.

NTCC is also concerned that several out-of state developers are trying to push individual projects through before the MVCP process is complete. The Planning Department should halt all individual applications until the new MVCP is in place.

Key points:

- Some of the proposed Alternatives recently released are a significant improvement on the Proposed Plan. However, all fail to take on board the need to eliminate development on the eastern side of Highway 267.
- While the BOS may not read all of the 2000 pages of the EIR, it can and should apply 'sanity checks' to the outcome, namely the MCVP.
 - In 1975, the average home in Martis Valley was about 1500 square feet, and had no landscaping.
 - Recently built, and proposed, homes are typically over 3000 square feet, and have significant landscaping.
 - At least four new golf courses are proposed.
 - HENCE the demand on the water supply by these homes will be AT LEAST DOUBLE that envisaged in 1975. Hence the total number of units allowed should be close to half of that envisaged in 1975 (or less than 6,000).
- Placer County Planning does not believe that economic demand in his area can exceed 5,254 units by 2021. The Planning for this area needs to be built around this figure (and not 9,200 total units).
- NTCC believes that the best of the proposed new Alternatives is the LOWEST INTENSITY ALTERNATIVE (at 2,646 new units), but that this Alternative fails to properly address the need to preserve areas east of Highway 267 and address required mitigations on developers to the west of Highway 267.

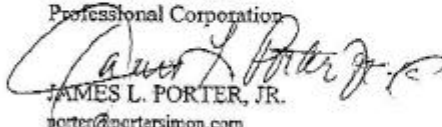
237-6

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 237: PAUL VATISTAS, NORTH TAHOE CONSERVATION COALITION

- Response 237-1* The commentor's statements regarding the alternatives analysis provided in the Revised Draft EIR and the desire to restrict development east of SR 267 is noted. While it is acknowledged that the proposed Martis Valley Community Plan is intended to regulate development within the Plan area through the year 2020, land use maps under consideration for the Martis Valley Community Plan are intended to show all land uses associated with buildout of the Plan area. The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis).
- Response 237-2* The Martis Valley Community Plan does not involve land uses and public services within Squaw Valley. The commentor is referred to Master Response 3.4.4 (Water Supply Effects of the Project).
- Response 237-3* The commentor is referred to Master Response 3.4.1 (Project Description Adequacy).
- Response 237-4* Responses to these comments are provided in Response to Comments 237-5 and 237-6.
- Response 237-5* The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis).
- Response 237-6* The commentor's regarding the Revised Draft EIR, development conditions in the Plan area and general support for the Lowest Intensity Alternative with the prohibition of development east of SR 367 is noted. The comment is referred to Response to Comment 237-1.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

MAY.02'2003 14:47	Letter 238	#0340 P.020/043
<p>KELLY R. CARROLL*† PETER H. CUTTITTA* STEVEN C. GROSS* STEPHEN C. LIEBERMAN JAMES L. PORTER JR.* JAMES E. SIMON</p> <p><i>Reply to Truckee Office</i></p>	<div style="border-top: 1px solid black; border-bottom: 1px solid black; padding: 5px 0;">Law Office Of PORTER • SIMON Professional Corporation</div> <p>April 24, 2003</p>	<p>ANDREW J. MORRIS* JAMES L. OLAMSTED†† KENNETH P. CRAIG* RINKY S. FARWANI JULIA E. BURT**</p> <p><small>*Also Licensed in Nevada ** Also Certified Public Accountant †Certified Specialist in Estate Planning, Trusts and Probate Law ††Also Licensed in Nevada, Oregon and Washington</small></p>
<p>Attention: Lori Lawrence Environmental Review Technician Placer County Planning Department 11414 "B" Avenue Auburn, CA 95603</p>	<div style="border: 1px solid black; padding: 5px; display: inline-block;">R E C E I V E D APR 28 2003 PLANNING DEPT.</div>	
<p>Re: <i>MVCP RDEIR Record Submission</i></p>		
<p>Dear Ms. Lawrence:</p> <p>Attached please find a copy of a letter from Tim Silva, General Manager of Northstar-At-Tahoe, which was previously sent to the Placer County Planning Department. Please consider this letter and the attached letter from Mr. Silva an official submission to the record for the Martis Valley Community Plan Update and the Martis Valley Community Plan Revised Draft Environmental Impact Report.</p> <p>As noted in the attached letter, historical data on actual usage of residential units at Northstar-At-Tahoe indicates that the 80/20 ratio of non-permanent to permanent residential use overstates permanent residential use and therefore also overstates potential environmental and traffic impacts of residential units in the Martis Valley. Also, as noted in the attached letter, evidence of actual usage indicates that the ratio is instead 90/10. Further, actual usage data suggests that this ratio will continue for further development at Northstar-At-Tahoe.</p> <p>Thank you very much for your consideration and for entering these documents and this information in the official record for the Martis Valley Community Plan.</p> <p style="text-align: center;">Very truly yours,</p> <div style="text-align: center;"><p>PORTER • SIMON Professional Corporation</p><p>JAMES L. PORTER, JR. porter@portersimon.com</p></div>		
<p>JLO:cjg Enclosure (1) 1. Letter dated 2/5/03 from Tim Silva</p>		
<p>TRUCKEE OFFICE • 40200 Truckee Airport Rd • Truckee, California 96161 • (530) 587-2002 • Fax (530) 587-1316 RENO OFFICE • Twentieth Century Building • 335 W. First Street • Reno, Nevada 89503 • (775) 322-6767 SOUTH LAKE TAHOE OFFICE • 2269 James Avenue • South Lake Tahoe, California 96150 • (530) 541-4352</p>		

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

MAY.02'2003 14:47

Feb - 5. 2003 2:14PM

NORTHSTAR ADMINISTRATION

#0340 P.021/043

No.61/8 P. 2



February 5, 2003

Placer County Planning Department
Placer County Planning Department
11414 "B" Ave.
Auburn, CA 95603

Re: Percentage of permanent residents to non-permanent residents in Martis Valley

To Whom it May Concern:

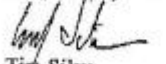
In reviewing the draft Martis Valley Community Plan Update and associated Environmental Impact Reports we noted that various environmental and traffic and circulation impacts are based upon an estimated ratio of 80% non-permanent to 20% permanent residential use.


Based upon information about actual usage of residential units at Northstar-At-Tahoe, we believe that the 80/20 ratio is inaccurate and overstates the potential impacts of residential units in the Martis Valley.

Specifically, our data indicates that of the existing 1,428 residential units at Northstar, only 144, or 10%, are used as full time residences. Based upon our observations of the actual usage of residential units at Northstar-At-Tahoe over a period of 30 years, we have every indication and expectation that this 90/10 pattern of residential usage will continue for any further development at Northstar.

Please enter this letter into the official record in the Martis Valley Community Plan Update process so that it may be considered by the decision making bodies in their decisions on this matter.

Respectfully submitted,


Tim Silva
General Manager

P.O. Box 129 • Truckee • California 96160-0129 • (530) 562-1010
Northstar-At-Tahoe is owned and operated by Trillium Lake Company
Northstar, Northstar-At-Tahoe and  are registered service marks of Trillium Lake Company.

238-3

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 238: JAMES PORTER, LAW OFFICES OF PORTER - SIMON

Response 238-1 Comments associated with this letter are responded to in Response to Comment 238-3.

Response 238-2 The commentor's statements regarding the 20 percent permanent residency and 80 percent seasonal residency rates used in the Draft EIR and Revised Draft EIR may overstate the environmental effects of the project are noted. The commentor is referred to Master Response 3.4.2 (Assumptions Used for Development Conditions in the Plan Area).

Response 238-3 The commentor's statements regarding the 20 percent permanent residency and 80 percent seasonal residency rates used in the Draft EIR and Revised Draft EIR may overstate the environmental effects of the project are noted. The commentor is referred to Master Response 3.4.2 (Assumptions Used for Development Conditions in the Plan Area).

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 239

MAY.02'2003 14:47

#0340 P.023/043

By Email and USPS

111 Sandringham Road
Piedmont, CA 94611
April 28, 2003

Lori Lawrence,
Placer County Planning Department
11414 "B" Avenue
Auburn, CA 95603

RE: Martis Valley Community Plan Update, Revised Draft Environmental
Report, Section 6.0 – Project Alternatives ("RDEIR")

Dear Ms. Lawrence:

My wife and I have followed the planning process for the Martis Valley Community Plan Update and other projects in the Martis Valley for several years. We previously submitted comment letters on various aspects of the Draft EIR for the Martis Valley Community Plan Update issued in June 2002. We appreciate the opportunity to participate in the planning process and the current opportunity to provide comments on the recirculated Section 6.0 – Project Alternatives of the Martis Valley Community Plan Update. As noted in earlier letters, we own a home at Northstar and are familiar with many of the planning issues specific to the Martis Valley. Additionally, we have joined or helped form a number of groups with specific concerns about local and regional planning decisions. Notwithstanding these affiliations, the following comments are personal and do not necessarily reflect the positions of any of the groups with which we are affiliated. This comment letter focuses on a few of the issues raised by the recirculated Project Alternatives section.

Martis Valley Community Plan Update

We support the development of an updated Community Plan for the Martis Valley. The current plan which dates from the early 1970s no longer serves the community well. We believe that the County and the public have invested heavily in the development of the Update and that no additional projects in the Martis Valley should be considered until the work on the Update is complete. We hope that the County can convince the development community that their interests will best be served by supporting the County's efforts to develop an appropriate Update for the Martis Valley.

Different participants will draw different lessons from attending public meetings such as the ones Placer County Planning Department conducted for the Citizens Advisory Committee on the Martis Valley Community Plan Update. One lesson we took away from those meetings is that many interested members of the public, not necessarily all from Placer County, value the open space in the Martis Valley. Planning Director Yeager explained that, technically, golf courses count as open space for many planning purposes.

239-1

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

MAY.02'2003 14:48

#0340 P.024/043

The type of open space most valued by the public is **not** the open space of ski runs or golf courses, but the open space of meadows, chaparral and forested hillsides. Accordingly, we support a Martis Valley Community Plan which preserves unfragmented natural open space. This hope leads to the topic of how to pay for open space.

239-1
Cont.

Alternatives

We support the County's evaluation of a range of alternatives, but believe that failing to find an alternative which is clearly superior, as demonstrated by staff support, to the previously identified preferred alternative means the current effort to expand alternatives is a failure. The following comments on the current Project Alternatives are designed to assist in the effort to find an appropriate alternative which staff will deem superior to the current preferred alternative.

239-2

Open Space Development Fees

Developing a comprehensive method of insuring adequate compensation for current property owners who may not receive the zoning and development opportunity they thought they were going to enjoy is, no doubt, a challenging undertaking. The bedrock for such a plan will likely involve the payment of development fees by those property owners who, in the final plan, receive zoning consistent with the County's provision for additional development in the Martis Valley.

The RDEIR document on Project Alternatives is silent on the topic of appropriate compensation for reduced density alternatives reviewed. Is this an oversight? Shouldn't any serious consideration of reduced density alternatives include a discussion of equity for property owners?

239-3

The next version of an EIR for the Martis Valley Community Plan Update should include an adequate review of ways to reduce the impact of development (e.g., through dwelling unit reductions, adoption of appropriate land uses, and designation of appropriate sites for development to name a few of the most important techniques) along with a range of measures which ensure equitable treatment of current property owners.

Context for Review and Comment on the Revised DEIR

The first EIR for the Martis Valley Community Plan Update identified a number of important impacts. Issues raised by agencies and interested members of the public in comment letters and at public hearings provided additional information and questions for Placer County's review and consideration. Placer County's review of these comments has not yet been shared with the public.

239-4

In the absence of information concerning the County's analysis of issues previously raised and not yet addressed, any current review of the revised and recirculated Section 6.0 – Project Alternatives will necessarily be incomplete as the issues associated with other sections of the DEIR can not severed from the issues raised in a reconsideration of alternatives.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

MAY.02'2003 14:48

#0360 P.025/043

Support

We support the development of additional alternatives with less impact than the staff preferred alternative. A new Martis Valley Community Plan and related land use diagram which contemplates increasing the number of authorized dwelling units by 100 per cent seems at the outer limit of a range of reasonable additional development possibilities. Given the adverse current impacts (e.g., traffic congestion) of the recreational use of the Northstar ski resort, expanding commercial and other uses in the Martis Valley does not seem warranted.

239-5

Specifically, adding additional accommodations (e.g., hotels) and intensifying usage through development of time share units seems inconsistent with the current adverse impacts. Note that many had hoped the SR 267 Bypass would improve local traffic conditions. This hope has not been realized.

Location of New Dwelling Units

Assuming that approximately 2,500 additional dwelling units will be authorized for the Martis Valley, where should these units be located? Perhaps an easier question is where should they not be located. These issues are not adequately discussed in the recirculated Project Alternatives.

The current Section 6.0 does not address the issues of how the locations of proposed additional dwelling units for the new alternatives were selected. This seems a major oversight.

239-6

Note that the development potential for the Martis Valley as outlined in the lower density alternatives considered in the RDEIR, although dramatically less than the level anticipated thirty years ago, represents one of the largest increases in dwelling units and anticipated usage for this part of the Sierras. Appropriate siting of any additional dwelling units is an opportunity to lessen various impacts on the Martis Valley and to preserve natural open space which should not be ignored.

The County should revisit the issue of where additional units should be located and recirculate the Project Alternatives.

Permanent Open Space

The final version of the Martis Valley Community Plan, should, consistent with Placer County's general resource protection policies, include provision for long term protection for areas not approved for development in the Martis Valley Community Plan Update. Accordingly, the Martis Valley Community Plan and the Alternatives analyzed, should make provision for permanent protection of property not designated for development in this Update.

239-7

The Northstar Property Owners Association Board, representing the largest single group of property owners in the Martis Valley, recently endorsed a "Memorandum of Understanding" with East West Partners, in significant part, because they believe the

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

MAY.02'2003 14:48

#0340 P.026/043

agreement capped total development aspirations of East West Partners and Trimont Land Company in the Martis Valley. That agreement is cited here solely to illustrate public support for the idea that the current planning effort for Martis Valley should not be a ten or twenty year stopgap measure, but should represent the County's best effort to set the appropriate permanent level of development for the region and should include effective measures of permanent open space protection.

239-7
Cont.

Summary

Viewed in isolation the current examination of "alternatives" is incomplete in several respects noted earlier in this comment letter. Revising the Project Alternatives section of the Draft EIR to address the issues raised (e.g., explaining the rationale for the Alternatives, using a range of techniques to reduce adverse impacts, providing for open space and property owner equity) should make the next consideration of alternatives more interesting.

239-8

The current version of Project Alternatives is inadequate and should be revised and recirculated.

Thank you again for the opportunity to comment.

Sincerely,

David Welch

C: Fred Yeager

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 239: DAVID WELCH, RESIDENT

- Response 239-1* The commentor's general statements regarding the Martis Valley Community Plan Update process and the desire to preserve natural open space is noted. These comments will be forwarded to the Placer County Planning Commission and Board of Supervisors for consideration. Since no comments regarding the adequacy of the Draft EIR or Revised Draft EIR were received, no further response is required.
- Response 239-2* The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis).
- Response 239-3* Consideration of methods to acquire land areas and/or development rights (as suggested by the commentor) is an economic issue/policy to be considered by the County as part of the planning process. CEQA Guidelines Section 15131 specifically notes that economic concerns are not considered physical effect on the environment and thus was not discussed in the Revised Draft EIR. The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis).
- Response 239-4* Comments received on the Draft EIR and the Revised Draft EIR are responded to in this document.
- Response 239-5* The commentor's statements regarding the range of alternatives that should be considered in relation to current conditions in the Plan area (e.g., traffic) are noted. The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis).
- Response 239-6* The commentor is referred to Master Response 3.4.5 (Adequacy of the Alternatives Analysis).
- Response 239-7* The commentor's statements regarding the protection of areas not designated for development is noted. The land use designations set forth in the Martis Valley Community Plan (e.g., Open Space and Forest) specifically restrict the extent of land uses that could occur in these areas. However, it is acknowledged in the Martis Valley Community Plan and evaluated in the Draft EIR and Revised Draft EIR that allowed uses under these land use designations could result in significant impacts (e.g., Draft EIR page 4.9-39).
- Response 239-8* The commentor's comments regarding the alternatives analysis is responded to in Response to Comments 239-2 through -6. The County considers the Draft EIR and the Revised Draft EIR adequate for consideration of the Martis Valley Community Plan and in compliance with CEQA.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

Letter 240

MAY.02'2003 14:49

#0340 P.027/043

Lori Lawrence - Martis Va Plan Update Section 6 Comments due by April 30

Pa

From: Adda Quinn <envirohorse@yahoo.com>
To: <ljlawren@placer.ca.gov>
Date: 3/21/03 10:45PM
Subject: Martis Va Plan Update Section 6 Comments due by April 30

March 15, 2003

Lori Lawrence
Placer County Planning Dept
11414 B Ave
Auburn CA 95603
530-886-3000

Re Notice of Recirc Of Revs to Draft EIR for Martis
Valley Community Plan Update SC#2001072050: Section 6
addition of lower density/intensity alternative.

Comments due April 30, 2003

Dear Ms. Lawrence and Placer County Planners

First, we would like to thank the County for being
responsive to the overwhelming public opinion that
density must be limited in the Martis Valley and
revising the DEIR according to public input.

Second, we concur whole-heartedly with the County's
conclusion in the revised DEIR on page 15 that:
Based upon the evaluation described in this section,
the Reduced Intensity Alternative is
considered to be the environmentally superior
alternative. This alternative was determined to have
less adverse environmental impacts than the proposed
project on most issues overall.

We urge the County to adopt the Revised DEIR now with
the lower density/intensity alternative.

Thank you for listening to the public in this regard.

Sincerely,

Adda Quinn
1119 Martis Landing

envirohorse@yahoo.com from Adda Quinn

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240-1

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT AND REVISED DRAFT EIR

LETTER 240: **ADDA QUINN, RESIDENT**

Response 240-1 The commentor's general statements regarding the alternatives analysis provided in the Revised Draft EIR is noted. However, it should be noted that the Revised Draft EIR identifies that the Lowest Intensity Alternative would have the least extent of impact on the environment (as compared to the Proposed Land Use Diagram) (Revised Draft EIR page 6.0-50).